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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		regarding Joint Pretrial memorandum dates (.1); strategize regarding value of OCB defense based on expert witness disclosures (.3); strategize about insolvency admissions (.3); consider new deadlines and settlement strategy (.2); plan for call and call to Atty. Aframe regarding litigation issues and continuance (.2); review outstanding discovery requests and email Atty. Aframe about status of same (.4).		
03/24/14	goneil 0011	Draft Motion to Extend Deadline to file Joint Pretrial Memorandum (.5); review and revise same (.2); telephone calls (.2) and email (.1) to Atty. Aframe regarding same; re-configure Motion to Extend Joint Pretrial memorandum deadline to reflect non-assent, based on inability to reach Atty. Aframe (.2); finalize Motion to Extend for filing and attend to filing same (.2); confer with Trustee regarding next steps toward settlement (.1).	1.50	382.50
03/25/14	goneil 0011	Review Court's Order extending deadline to file Joint Pretrial Memorandum and track new deadline (.1); telephone call with Atty. Aframe regarding extension of Joint Pretrial Memorandum, discovery, and possibility of settlement (.2); follow up regarding same (.1).	0.40	102.00
03/25/14	goneil 0011	Review case materials to develop settlement proposal.	0.30	76.50
03/25/14	goneil 0011	Continue reviewing discovery response and related case materials to develop parameters of possible settlement (.4); research new value and ordinary course of business case law to develop proposal and ascertain difference between Trustee's and Defendant's analysis (.6).	1.00	255.00
03/26/14	goneil 0011	Review multiple emails from Atty. Aframe attaching invoices.	0.20	51.00
03/31/14	goneil 0011	Review next steps to develop negotiations.	0.10	25.50
04/10/14	jemurphy 0011	Communications with Attorney Aframe regarding status of settlement; strategy regarding settlement negotiations and next steps; draft correspondence to Attorney Aframe regarding the defendant's ordinary course defense.	0.50	127.50
04/10/14	goneil 0011	Emails regarding status of proposed settlement (.2); strategize regarding settlement response	0.30	76.50

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04/11/14 jemurphy	0011	(.1). Communication with Attorney Aframe regarding cases supporting his irregular "ordinary course of dealings" defense.	0.10	25.50
04/11/14 goneil	0011	Review emails with Atty. Aframe regarding ordinary course defense (.1); review issues regarding ordinary course defense in order to develop settlement proposal/recommendation (.4).	0.50	127.50
04/11/14 kfoley	0011	Review of Quickflights payment charts and attention to next steps regarding Quickflights' ordinary course of business defense.	0.20	44.00
04/15/14 goneil	0011	Assess ordinary course defense.	0.10	25.50
04/15/14 kfoley	0011	Case law research regarding elements of ordinary course of business defense pursuant to Bankruptcy Section 547(c)(2).	0.80	176.00
04/16/14 goneil	0011	Review timeline and assess settlement.	0.10	25.50
04/16/14 goneil	0011	Review ordinary course case law in order to assess settlement ability.	0.40	102.00
04/16/14 kfoley	0011	Review of case law research regarding ordinary course of business defense pursuant to Bankruptcy Code Section 547(c) (.7); evaluate merits of Quickflights' ordinary course of business defense pursuant to Bankruptcy Code Section 547(c) (.2).	0.90	198.00
04/16/14 kfoley	0011	Further review of case law research, evaluate Quickflights' ordinary course of business defense pursuant to Bankruptcy Code Section 547(c) and strategize regarding next steps related to settlement negotiations with Quickflights.	0.60	132.00
04/17/14 goneil	0011	Review discovery, fully assess and calculate Defendant's ordinary course of business defense (3.7); confer with Trustee regarding Joint Pre-trial Memorandum status (.1).	3.80	969.00
04/18/14 JHB	0011	Review defendant emails regarding defenses, devise and send response regarding same.	0.40	156.00
04/18/14 goneil	0011	Review email from Atty. Aframe regarding ordinary course defense (.1); telephone call with Atty. Aframe regarding same (.2).	0.30	76.50
04/21/14 goneil	0011	Draft Second Assented-To Motion to Extend Deadline to File Joint Pretrial Memorandum.	0.30	76.50
04/22/14 JHB	0011	Review open litigation issues, resolution strategies and emails.	0.20	78.00

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04/22/14	jemurphy	0011	Strategy regarding ordinary course defense in light of facts.	0.30	76.50
04/22/14	goneil	0011	Strategize regarding settlement (.1); review and revise Motion to Extend Pretrial Memorandum deadline (.2); email Atty. Aframe regarding same (.1); emails with Atty. Aframe and revise Motion consistent with Atty. Aframe's comments (.3); additional edits and emails with Atty. Aframe to finalize Motion to Extend (.2); attention to finalizing and efilng Motion to Continue (.2).	1.10	280.50
04/29/14	jemurphy	0011	Ongoing strategy regarding evaluation of settlement offer and litigation alternative.	0.20	51.00
04/29/14	goneil	0011	Strategize regarding settlement steps.	0.10	25.50
05/07/14	goneil	0011	Review and assess history of emails between Quickflight and Direct Air, including to create a summary of each (1.2); continue assessing discovery and case issues, including ordinary course and new value defenses, in context of continuing to draft, revise, and finalize lengthy and detailed settlement proposal (2.3); draft memorandum to Trustee with summary of issues to consider while assessing settlement proposal (.4).	3.90	994.50
05/08/14	JHB	0011	Review, revise settlement proposal and review underlying defenses, defense and transfer materials.	0.70	273.00
05/08/14	jemurphy	0011	Analyze settlement position and analysis of preference exposure from the Trustee; review status of the litigation and timing of next steps if settlement unsuccessful.	0.40	102.00
05/08/14	goneil	0011	Follow up regarding settlement proposal.	0.10	25.50
05/08/14	goneil	0011	Strategize regarding litigation aspects of settlement proposal (.1); emails with Trustee about proposal, analysis, and timing of matter (.1).	0.20	51.00
05/09/14	JHB	0011	Continued negotiations, defense assessment.	0.30	117.00
05/12/14	JHB	0011	Continued attention to open settlement, payment, extension issues, strategies if no resolution, and review related emails, discovery from opposing counsel.	0.30	117.00
05/12/14	goneil	0011	Finalize settlement proposal based on input from Trustee and send same to Atty. Aframe.	0.40	102.00
05/15/14	JHB	0011	Further review of open issues, settlement	0.30	117.00

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		negotiations, assess defenses and devise strategies to resolve; review related discovery issues, opposing counsel emails.		
05/15/14 goneil	0011	Review email from Atty. Aframe regarding settlement status.	0.10	25.50
05/20/14 goneil	0011	Telephone call with Atty. Aframe regarding settlement and Joint Pretrial Memorandum.	0.20	51.00
05/21/14 JHB	0011	Review open discovery, settlement issues and strategies.	0.20	78.00
05/21/14 goneil	0011	Provide status update to Trustee including to consider further extension of deadline to file Joint Pretrial Memorandum.	0.10	25.50
05/22/14 JHB	0011	Assess pretrial issues, settlement prospects, related pretrial, extension issues.	0.20	78.00
05/22/14 goneil	0011	Telephone call to Atty. Aframe (.1; prepare Third Assented-To Motion to Extend (.2); revise and finalize Extension Motion (.2) and email same to Atty. Aframe for his consideration (.2); execute and attend to e-filing Motion (.1).	0.80	204.00
05/23/14 JHB	0011	Continued attention to open discovery, settlement issues, strategies and related emails.	0.20	78.00
05/23/14 goneil	0011	Review and track Court's Order extending deadline to file Joint Pretrial Memorandum (.1); email Atty. Aframe regarding status of settlement proposal (.1).	0.20	51.00
05/28/14 jemurphy	0011	Review status of settlement and next steps in adversary proceeding against Quickflight.	0.10	25.50
05/28/14 goneil	0011	Follow up regarding status of settlement proposal (.1); email Atty. Aframe regarding settlement status (.1).	0.20	51.00
05/29/14 JHB	0011	Review status of avoidance action and next steps.	0.20	78.00
05/29/14 goneil	0011	Follow up with Trustee regarding next steps in settlement and litigation.	0.10	25.50
05/30/14 kmdellec	0011	Review pacer docket and update litigation control sheet accordingly.	0.10	18.50
05/30/14 goneil	0011	Attention to litigation planning.	0.10	25.50
05/30/14 goneil	0011	Review email from Atty. Aframe regarding settlement discussions.	0.10	25.50
05/31/14 JHB	0011	Review email from Attorney Aframe regarding defenses and devise response strategies.	0.20	78.00
06/02/14 kmdellec	0011	Additional updates to litigation control sheet.	0.10	18.50

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06/02/14	goneil	0011	Emails with Atty. Aframe regarding settlement status and prospects.	0.20	51.00
06/06/14	goneil	0011	Strategize regarding Joint Pretrial Memorandum and trial (.2); telephone call to Atty. Aframe regarding settlement proposal (.1).	0.30	76.50
06/19/14	goneil	0011	Review next steps based on lack of response from Quickflight.	0.20	51.00
06/24/14	jemurphy	0011	Review status of settlement negotiations; phone call/left message for Attorney Aframe regarding final settlement position.	0.10	25.50
06/25/14	JHB	0011	Review open pretrial defense and settlement issues and materials, need for further extension, and devise strategies for next steps.	0.30	117.00
06/25/14	jemurphy	0011	Review pretrial order for pretrial conference memorandum contents and begin to outline pretrial conference memorandum.	0.40	102.00
06/25/14	goneil	0011	Prepare materials necessary for advancing litigation including Joint Pre-Trial Memorandum (.5); strategize regarding Joint Pre-Trial Memorandum contents and exhibits and timing to produce same (.2); confer with Trustee regarding same (.1); telephone call to Attorney Aframe regarding Joint Pre-Trial Memorandum (.1); follow-up memorandum to Trustee (.1).	1.00	255.00
06/26/14	kmdellec	0011	Draft amended complaint to include post-petition transfer and review/revise same; review local rules and Federal Rules of Civil Procedure regarding amended adversary proceeding cover sheet.	1.20	222.00
06/26/14	jemurphy	0011	Phone call with M. Baldwin regarding QuickFlight's operations and payment to QuickFlight; strategy regarding US DOJ interview of M. Baldwin and information from M. Baldwin regarding cash payments received by QuickFlight.	2.30	586.50
06/26/14	goneil	0011	Follow up regarding call with M. Baldwin and possibility of additional cash transfers and strategize regarding supplemental discovery based on same (.4); review prior discovery requests and responses in context of same (.2).	0.60	153.00
06/27/14	JHB	0011	Review new transfer issues and materials and grounds for amending complaint, related discovery, pretrial strategies.	0.60	234.00

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06/27/14 jemurphy 0011	Analyze evidence of cash applied by QuickFlight post-bankruptcy; review QuickFlight's discovery responses for additional evidence of cash payments to QuickFlight; strategy regarding moving to amend the complaint and drafting correspondence to Attorney Aframe regarding the same.	1.20	306.00
06/27/14 goneil 0011	Review discovery responses in order to determine next steps (.2); memorandum regarding same (.2); strategize regarding amending Complaint and extending deadlines in context of same (.6); attention to preparation of Motion to Amend (.2); attention to preparation of Amended Complaint (.1); memoranda regarding discovery from Quickflight (.1).	1.40	357.00
06/28/14 JHB 0011	Review emails, additional materials from opposing counsel regarding additional transfers, complaint amendment (.3); strategies regarding pretrial and discovery issues (.2).	0.50	195.00
06/28/14 goneil 0011	Review memorandum to Atty. Aframe regarding amending Complaint.	0.10	25.50
06/28/14 goneil 0011	Attention to preparation of Motion to Amend Complaint and Extend Deadlines (.1); review revised proposed Sale Order (.6).	0.70	178.50
06/29/14 goneil 0011	Review emails from Atty. Aframe and Quickflight's principal regarding assent to Motion to Amend Complaint and regarding post-petition transfer.	0.10	25.50
06/30/14 kmdellec 0011	Review status of case/update litigation control sheet accordingly.	0.20	37.00
06/30/14 goneil 0011	Strategize regarding logistics for Amended Complaint filing (.1); attend to preparation of Motion to Amend Complaint and Extend Deadlines (.3).	0.40	102.00
07/01/14 kmdellec 0011	Assist with motion to amend complaint and relevant local rules and format.	0.50	97.50
07/03/14 goneil 0011	Draft Motion to Amend Complaint and Extend Discovery Related Deadlines (2.2); review and revise draft Amended Complaint (.4).	2.60	689.00
07/07/14 jemurphy 0011	Review correspondence from Attorney Aframe regarding amending Complaint; review Assented-to Motion to Amend Complaint and extend deadlines.	0.40	106.00
07/07/14 goneil 0011	Review and further revise Amended Complaint	0.40	106.00

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		(.2); attention to extension motion (.2).		
07/08/14 JHB	0011	Devise strategies regarding complaint amendment, discovery issues.	0.20	79.00
07/09/14 JHB	0011	Review and comment on amended complaint and motion regarding same and review underlying transfer materials.	0.60	237.00
07/09/14 jemurphy	0011	Phone call with Attorney Aframe regarding allegations that Quickflight failed to turn over all of Direct Air's cash earned at gate/on flights staffed by Quickflight.	0.10	26.50
07/09/14 goneil	0011	Finalize Amended Complaint, with Exhibit, and Motion to Extend Deadlines for Trustee's review, including to strategize about next steps and specific amendments (.9); review emails with Atty. Aframe regarding same (.1).	1.00	265.00
07/10/14 jemurphy	0011	Communications and conference with Attorney Aframe regarding Motion to Amend Complaint and Extend Pre-Trial Order Deadlines.	0.60	159.00
07/10/14 goneil	0011	Review revised Certificate of Service regarding extension motion and edit proposed order to conform (.1); follow up regarding extension motion and response from Atty. Aframe (.2); assist with filing same (.1).	0.40	106.00
07/11/14 kmdellec	0011	Assist with e-filing/service of motion to amend complaint.	0.30	58.50
07/11/14 jemurphy	0011	Review Court's order allowing Motion to Amend Complaint; attend to filing Amended Complaint.	0.10	26.50
07/11/14 goneil	0011	Follow up regarding filing of Motion to Amend including e-filing issues (.2); strategize regarding next steps for amending Complaint and discovery (.1).	0.30	79.50
07/14/14 goneil	0011	Calculate and track new discovery deadlines based on Court's Order.	0.10	26.50
07/17/14 jemurphy	0011	Attend to filing Amended Complaint.	0.10	26.50
07/18/14 JHB	0011	Further review of open discovery, recovery issues and strategies, upcoming pretrial issues.	0.30	118.50
07/21/14 jemurphy	0011	Strategy regarding additional discovery to request from Quickflight.	0.30	79.50
07/22/14 goneil	0011	Strategize regarding supplemental discovery.	0.20	53.00
07/24/14 goneil	0011	Follow up regarding supplemental discovery deadline.	0.10	26.50
07/25/14 JHB	0011	Review new discovery materials propounded to defendant.	0.30	118.50

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07/25/14 kmdellec 0011	Review status of case and update control chart accordingly.	0.20	39.00
07/25/14 jemurphy 0011	Draft additional Quickflight discovery (Second Request for Production of Documents, Second Set of Interrogatories and Second Set of Requests for Admission).	1.70	450.50
07/25/14 goneil 0011	Review emails regarding supplemental discovery requests.	0.10	26.50
07/28/14 kmdellec 0011	Review revisions to updated control chart.	0.10	19.50
07/28/14 kmdellec 0011	Review and track additional discovery requests; calendar ahead.	0.30	58.50
07/31/14 jemurphy 0011	Phone call with Attorney Aframe regarding Amended Complaint.	0.10	26.50
08/01/14 kmdellec 0011	Review Form 2 and update litigation control chart as to settlement proceeds received/expected.	0.10	19.50
08/04/14 JHB 0011	Review open issues, next steps in recovery action and strategies for resolution.	0.20	79.00
08/04/14 jemurphy 0011	Review status of adversary proceeding and analyze likely recovery for the Estate.	0.10	26.50
08/07/14 goneil 0011	Review Answer to Amended Complaint.	0.10	26.50
08/08/14 jemurphy 0011	Review Answer to Amended Complaint.	0.60	159.00
08/11/14 JHB 0011	Review open recovery, settlement issues.	0.10	39.50
08/12/14 JHB 0011	Review open discovery, document production issues and strategies, and strategies regarding continuing settlement discussions.	0.30	118.50
08/12/14 jemurphy 0011	Communications with Attorney Aframe regarding his request for an extension of discovery deadlines.	0.20	53.00
08/12/14 goneil 0011	Review emails regarding discovery deadlines and settlement.	0.10	26.50
08/28/14 JHB 0011	Review open settlement, discovery issues and emails.	0.20	79.00
08/28/14 jemurphy 0011	Communications with Attorney Aframe proposing settlement.	0.10	26.50
08/29/14 JHB 0011	Review discovery responses and strategies to address deficiencies.	0.20	79.00
08/29/14 kmdellec 0011	Review adversary proceeding and main case dockets and update litigation control sheet accordingly.	0.10	19.50
08/29/14 jemurphy 0011	Review case deadlines; status of the case and next steps; strategy with trustee regarding settlement opportunities and next steps.	0.60	159.00
08/29/14 jemurphy 0011	Communications with Attorney Aframe regarding	0.10	26.50

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		defendant's delayed discovery responses and extension of subsequent case deadlines.		
09/02/14	jemurphy 0011	Communications with Attorney Aframe regarding the status of Quickflight's discovery responses and motion to extend case deadlines; strategy regarding parameters for acceptable motion to extend time; discuss settlement with Attorney Aframe; draft correspondence to Attorney Aframe regarding moving to extend discovery/other case deadlines and settlement considerations.	1.00	265.00
09/02/14	goneil 0011	Strategize regarding discovery extension and related motions.	0.20	53.00
09/03/14	JHB 0011	Continued attention to discovery issues, production deficiencies and strategies to address, review and devise response to extension motion.	0.30	118.50
09/03/14	jemurphy 0011	Draft correspondence to Attorney Aframe regarding moving to extend discovery deadline; review Quickflight's Motion to Extend Discovery; strategy regarding response to Quickflight's motion.	0.40	106.00
09/03/14	goneil 0011	Review and assess Defendant's Motion to Extend Discovery Deadline, including to consider response (.2); memoranda with Trustee and counsel regarding same (.1); draft response to Defendant's Motion to extend, including to review prior pleadings and deadlines (1.0).	1.30	344.50
09/04/14	JHB 0011	Strategize with litigation team regarding discovery, possible deposition, review draft response to extension motion.	0.40	158.00
09/04/14	jemurphy 0011	Review and edit response to Quickflight's Motion to Extend Time.	0.20	53.00
09/04/14	jemurphy 0011	Analysis and strategy regarding conducting depositions.	0.20	53.00
09/04/14	goneil 0011	Revise Response and send to Trustee for review (.6); memoranda with Trustee and litigation team regarding edits and depositions (.2); further revise Response and prepare for e-filing (.2); review and execute Certificate of Service (.1).	1.10	291.50
09/05/14	goneil 0011	Review and track Court's Order extending deadlines.	0.10	26.50
09/08/14	JHB 0011	Continued attention to discovery issues and timing.	0.30	118.50

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09/08/14 jemurphy	0011	Review Court's Order on new case deadlines.	0.10	26.50
09/09/14 JHB	0011	Conference with Attorney Murphy regarding discovery, litigation and resolution issues and strategies.	0.30	118.50
09/09/14 RBG	0011	Strategy planning/discussion regarding trial in connection with preference claims.	0.40	154.00
09/09/14 kmdellec	0011	Attention to ECF notice for J. Baldiga.	0.10	19.50
09/09/14 jemurphy	0011	Initial strategy regarding analyzing merits of the case, expected outcome at trial, costs and settlement considerations; strategize with Trustee regarding next steps in litigation.	0.60	159.00
09/09/14 goneil	0011	Strategize regarding discovery deadline and next steps (.1); strategize regarding trial and joint pretrial memorandum (.2); track deadlines related to pre-trial memorandum (.1); review emails with Attorney Aframe regarding discovery responses and liability for post-petition transfers (.1).	0.50	132.50
09/10/14 JHB	0011	Continued review of discovery deficiencies and steps to address.	0.20	79.00
09/10/14 goneil	0011	Review memoranda with Atty. Aframe about missed discovery deadline.	0.10	26.50
09/11/14 JHB	0011	Review discovery responses, deficiencies, next steps toward resolution, recovery.	0.30	118.50
09/11/14 jemurphy	0011	Review Quickflight's Answers to Second Set of Interrogatories; review options for compelling further answers; communications with Attorney Aframe regarding interrogatory answers and settlement.	0.40	106.00
09/16/14 JHB	0011	Review open discovery, pretrial issues and strategies, next steps in attempted resolution, related defense materials and responses.	0.30	118.50
09/16/14 jemurphy	0011	Strategy regarding facts and affirmative defenses on which the Trustee does not object; strategy regarding Trustee's statement of the case for Joint Pretrial Memorandum.	0.40	106.00
09/16/14 goneil	0011	Follow up regarding status of discovery and joint pretrial memorandum (.1); assist with strategy regarding preparation of pretrial memorandum (.1).	0.20	53.00
09/16/14 goneil	0011	Confer with Trustee regarding status of matter and next steps.	0.10	26.50
09/22/14 JHB	0011	Devise pretrial strategies with Attorney Murphy (.2); review and revise draft pretrial memo and	0.50	197.50

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09/22/14 RBG	0011	convey comments regarding same (.3). Strategy planning regarding pending adversary proceedings.	0.30	115.50
09/22/14 kmdellec	0011	Review claims register to determine if proof of claim filed by Quickflight and report results.	0.10	19.50
09/22/14 jemurphy	0011	Phone call with Attorney Aframe with merits of the case and Joint Pre-Trial Memorandum.	0.70	185.50
09/22/14 jemurphy	0011	Review case documents and case facts admitted in discovery; analyze facts to be established at trial; draft and edit Joint Pretrial Memorandum.	3.90	1,033.50
09/22/14 jemurphy	0011	Communications with P. Bley regarding potential role as witness in Quickflight trial.	0.10	26.50
09/22/14 goneil	0011	Strategize regarding Joint Pretrial Memorandum and possibility of mediation (.2); review and revise portions of Joint Pretrial Memorandum (.4); additional strategy regarding format and style of Joint Pretrial Memorandum (.2); attention to timing and filing deadlines regarding same (.2).	1.00	265.00
09/23/14 goneil	0011	Cross-check and track upcoming deadlines.	0.20	53.00
09/24/14 jemurphy	0011	Strategy regarding trial exhibits, witnesses and presentation of evidence.	1.00	265.00
09/24/14 goneil	0011	Strategize regarding Joint Pretrial Memorandum and trial format, research, and related issues.	0.60	159.00
09/25/14 JHB	0011	Review additional discovery materials, implications for recovery, settlement.	0.30	118.50
09/26/14 jemurphy	0011	Continue review of Avondale's discovery and identify relevant facts not in dispute; begin to outline Joint Pretrial Memorandum.	3.40	901.00
09/26/14 goneil	0011	Review memorandum to Atty. Aframe regarding outstanding discovery responses (.1); review Joint Pretrial Memorandum draft and consider additional facts to add (.2).	0.30	79.50
09/28/14 JHB	0011	Continued review of pretrial memo, issues, new materials from Attorney Aframe.	0.40	158.00
09/29/14 jemurphy	0011	Conference with Attorney Aframe regarding content of Joint Pretrial Memorandum, and merits of the case and defenses.	0.80	212.00
10/01/14 JHB	0011	Review additional discovery materials from defendant, identify deficiencies and devise strategies to address.	0.70	276.50
10/01/14 jemurphy	0011	Communications with Attorney Aframe regarding final draft of Joint Pre-Trial Memorandum and	0.60	159.00

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10/01/14	goneil	0011	supplemental discovery from Quickflight. Review memoranda with Atty. Aframe regarding additional discovery responses.	0.10	26.50
10/03/14	JHB	0011	Review open pretrial issues, Attorney Aframe revisions, continued deficiencies in discovery responses and steps to address.	0.40	158.00
10/03/14	jemurphy	0011	Communications with Attorney Aframe regarding Joint Pre-Trial Memorandum; review further changes by Attorney Aframe; edits to Pre-Trial Memorandum and prepare to file.	0.80	212.00
10/06/14	JHB	0011	Review revised pretrial statement, review underlying transfer and defense issues and materials, devise settlement and discovery strategies.	0.60	237.00
10/06/14	jemurphy	0011	Communications with Attorney Aframe regarding final Pretrial Conference Memorandum for filing; attend to filing the same.	0.10	26.50
10/06/14	goneil	0011	Attention to Joint Pretrial Memorandum deadline.	0.10	26.50
10/09/14	JHB	0011	Review litigation, settlement status and next steps.	0.20	79.00
10/14/14	JHB	0011	Review open discovery, pretrial issues and scheduling.	0.20	79.00
10/14/14	jemurphy	0011	Review Court's Order for Pre-Trial Conference; plan for Pre-Trial Conference.	0.20	53.00
10/14/14	goneil	0011	Review and track Court's Order scheduling Pretrial Conference; review memorandum from Trustee regarding same.	0.10	26.50
10/17/14	JHB	0011	Continued attention to discovery, pretrial issues and strategies, next steps for trial preparation.	0.20	79.00
10/21/14	kmdellec	0011	Update litigation control chart.	0.10	19.50
10/23/14	JHB	0011	Conference with Attorney Aframe regarding open discovery issues, settlement strategies (.2), related review of underlying defense materials and arguments (.3).	0.50	197.50
10/24/14	kmdellec	0011	Update preference chart as to current status/deadlines.	0.10	19.50
	TYPE	0011	TOTAL	126.90	34,590.50

TASK: 0012 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
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139 JHB Joseph H. Baldiga	0.50	195.00	390.00
290 goneil Gina B. O'Neil	8.70	2,218.50	255.00
274 kmdellec Kimberly M. De	5.20	962.00	185.00

TYPE 0012	TOTAL	14.40	3,375.50
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Time Detail

Hours Value

08/16/13 goneil 0012	Review email from Trustee extending Allegheny County Airport Authority deadline (.1).	0.10	25.50
09/16/13 goneil 0012	Review subfile status including passing of response deadline, email Trustee regarding same, and prepare materials for Complaint.	0.20	51.00
09/17/13 kmdellec 0012	On-line search regarding defendant information; attention to conflict search; review demand and back-up information and draft complaint and coversheet and review/revise same; obtain copy of proof of claim filed by defendant from pacer.	1.30	240.50
09/30/13 goneil 0012	Review, edit, finalize, and execute Complaint and Adversary Proceeding cover sheet.	0.40	102.00
10/01/13 kmdellec 0012	Finalize complaint, exhibits and cover sheet for efilng and final review of all.	0.30	55.50
10/01/13 goneil 0012	Attention to filing Complaint.	0.10	25.50
10/02/13 kmdellec 0012	Receipt of summons and prepare certificate of service and transmittal letter for same; update control sheet and calendar ahead regarding answer deadline.	0.70	129.50
10/02/13 goneil 0012	Review Summons and track Answer deadline.	0.10	25.50
10/03/13 goneil 0012	Review service of process package, research updated contact information, and edit Certificate of Service based on same (.3); review and execute revised Certificate of Service package (.1).	0.40	102.00
10/04/13 kmdellec 0012	Finalize transmittal letter enclosing summons and complaint; final review of certificate of service prior to efilng; update control sheet and calendar ahead regarding answer deadline.	0.60	111.00
10/04/13 goneil 0012	Confirm service issues.	0.10	25.50
10/09/13 kmdellec 0012	Attention to receipt of proof of service.	0.10	18.50
10/10/13 kmdellec 0012	Receipt/track remaining proof of service.	0.10	18.50
10/11/13 goneil 0012	Confirm receipt of service of process.	0.10	25.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee

14190 Direct Air (Southern Sky Air & Tours, LLC)

10/15/13 goneil	0012	Review completed Complaint and service package and follow up regarding next steps.	0.10	25.50
10/29/13 JHB	0012	Review settlement parameters, claim materials.	0.30	117.00
10/29/13 goneil	0012	Telephone call from Attorney Smith regarding settlement (.2); confer with Trustee regarding same (.1); develop full settlement terms, including to review and assess proof of claim in connection with same (.5); email Attorney Smith to follow up on call and outline settlement terms (.3); attend to preparation of Settlement Agreement (.2).	1.30	331.50
10/30/13 goneil	0012	Draft Stipulation of Settlement (.5); draft Motion to Approve Stipulation with proposed Order (.4); draft Motion to Limit Notice, with proposed Order (.2).	1.10	280.50
10/31/13 JHB	0012	Revise settlement stipulation.	0.20	78.00
10/31/13 goneil	0012	Review and revise Stipulation (.2); review and revise Motion to Approve (.2); review and revise Motion to Limit Notice, with proposed Order (.1); finalize all pleadings and email Stipulation to Attorney Smith for review (.3); emails with Attorney Smith regarding comments on Stipulation (.1); review and assess comments (.1); revise and edit Stipulation to reflect Attorney Smith's requested charges (.6); finalize Stipulation for Trustee review and confer with Trustee regarding same (.2); incorporate Trustee's edits into Stipulation and email revised Stipulation to Attorney Smith for further review (.2); revise Motion to Approve to reflect updated Stipulation terms (.2).	2.20	561.00
11/01/13 kmdellec	0012	Track answer deadline and review pacer docket as to answer, if any.	0.10	18.50
11/01/13 goneil	0012	Finalize Motion to Approve (.1); review and revise Certificate of Service and update service list (.1).	0.20	51.00
11/04/13 goneil	0012	Follow up regarding Stipulation status and lapsed Answer deadline.	0.10	25.50
11/05/13 goneil	0012	Review email from Attorney Smith regarding status of Stipulation and funds.	0.10	25.50
11/06/13 goneil	0012	Emails with Attorney Smith regarding signature pages on Stipulation.	0.10	25.50
11/07/13 kmdellec	0012	Finalize settlement pleadings for	0.30	55.50

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		efiling/service.		
11/07/13	goneil 0012	Review emails from Attorney Smith attaching second signature, execute, and finalize approval package for filing.	0.20	51.00
11/07/13	goneil 0012	Review local rules regarding electronic signatures (.1); email Attorney Smith with fully-executed Stipulation and information regarding next steps (.2).	0.30	76.50
11/08/13	kmdellec 0012	Track order allowing motion to limit notice.	0.10	18.50
11/08/13	goneil 0012	Attend to filing Stipulation approval package.	0.10	25.50
11/12/13	kmdellec 0012	Draft notice of voluntary dismissal with certificate of service; review and revise and confirm service address.	1.00	185.00
11/15/13	goneil 0012	Note passage of funding deadline and email Attorney Smith to follow up regarding same; confirm receipt of funds, track, and address deposit of same.	0.30	76.50
12/05/13	kmdellec 0012	Forward order approving settlement to E. Smith via electronic mail; update control sheet; revisions to notice of dismissal and calendar ahead regarding entry of final order and efiling of same.	0.30	55.50
12/06/13	goneil 0012	Review Order approving Allegheny Stipulation and follow up regarding next steps to dismiss.	0.10	25.50
12/09/13	goneil 0012	Review and edit Notice of Voluntary Dismissal.	0.20	51.00
12/10/13	goneil 0012	Review and execute Notice of Dismissal.	0.10	25.50
12/20/13	kmdellec 0012	Review Pacer docket as to appeals, if any, and finalize notice of voluntary dismissal for e-filing and service.	0.20	37.00
12/23/13	goneil 0012	Attend to filing Dismissal Notice and review Court's dismissal docket entries (.1); email Dismissal Notice to Attorney Smith (.1); update Preference chart to wrap up matter (.1).	0.30	76.50
12/30/13	kmdellec 0012	Track efiling/service of notice of dismissal.	0.10	18.50
01/02/14	goneil 0012	Emails with Attorney Smith regarding amended Proof of Claim and potential distributions (.2); track allowed amended Proof of Claim (.1).	0.30	76.50
01/07/14	goneil 0012	Review new docket entries regarding case closure and disposition of adversary proceeding; update chart to reflect.	0.10	25.50
	TYPE 0012	TOTAL	14.40	3,375.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

TASK: 0013 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
139 JHB Joseph H. Baldiga	2.40	936.00	390.00
290 goneil Gina B. O'Neil	18.40	4,692.00	255.00
255 cborourk Cori B. O'Rour	2.10	399.00	190.00
281 jemurphy Jessica E. Mur	50.20	12,801.00	255.00
162 RBG Robert B. Gibbons	1.90	712.50	375.00
274 kmdellec Kimberly M. De	4.70	869.50	185.00
337 abaer Amanda M. Baer	2.10	462.00	220.00
TYPE 0013 TOTAL	81.80	20,872.00	

Time Detail			Hours	Value
09/16/13 goneil	0013	Review Trustee's summary email regarding insider preference Complaints (.1); review Insider Analysis Chart and develop strategies for insider preference Complaints (.8); present insider analysis to Trustee and continue developing Complaint strategies (.4).	1.30	331.50
09/18/13 goneil	0013	Strategize with Trustee regarding attachments and preliminary injunctions associated with insider transfer Complaints (.3); compile materials necessary to prepare same (.1).	0.40	102.00
09/19/13 jemurphy	0013	Strategy with Attorney O'Neil regarding complaints to bring against founding members and available prejudgment security.	0.50	127.50
09/19/13 goneil	0013	Strategize regarding Complaints v. insiders.	0.20	51.00
09/24/13 goneil	0013	Assess to logistics of preliminary injunction.	0.10	25.50
09/24/13 goneil	0013	Follow-up regarding preference-related questions to ask founders at interview.	0.10	25.50
10/04/13 JHB	0013	Strategies regarding Keilman demand.	0.20	78.00
10/04/13 kmdellec	0013	Draft demand letter to Robert Keilman and attention to exhibit identifying preference/fraudulent transfer payments; attention to revisions for both.	1.20	222.00
10/04/13 jemurphy	0013	Develop and edit preference and fraudulent transfer demand letter to B. Keilman.	2.10	535.50
10/04/13 goneil	0013	Strategize regarding next steps to pursue R. Keilman (.2); attend to preparation of demand letter for Mr. Keilman (.6); review and revise	2.20	561.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		demand letter and exhibit (.2); telephone call with Trustee regarding demand letter (.2); additional edits to demand letter, including to reference Massachusetts state fraudulent transfer law, based on Trustee's suggestions (.7); finalize demand letter and email same to Attorney Rafferty (.3).		
10/06/13	JHB 0013	Review insider transfer issues and materials, demand strategies (.3); review related demand to Mr. Keileman (.1).	0.40	156.00
10/07/13	goneil 0013	Follow-up regarding demand letter to Mr. Keilman.	0.10	25.50
10/08/13	kmdellec 0013	Review back-up information as to payments; draft Complaint for fraudulent transfers/preferences and adversary cover sheet; review and revise Complaint to include additional possible counts and attention to exhibits; electronic mail to Accountant to request copies of back-up.	3.50	647.50
10/08/13	goneil 0013	Discuss logistics of insider Complaints with Trustee (.1)	0.10	25.50
10/09/13	RBG 0013	Strategy planning / discussion regarding document production and pending deposition.	0.20	75.00
10/10/13	RBG 0013	Strategy planning / discussion and research regarding fraudulent transfer claims against CFO in connection with repayment of alleged investments.	1.30	487.50
10/10/13	jemurphy 0013	Strategy and review requirements for proposed causes of action; strategy regarding preference and fraudulent transfer claims to be brought against B. Keilman and other founding members.	2.10	535.50
10/10/13	jemurphy 0013	Analyze payments from and to B. Keilman.	0.60	153.00
10/10/13	jemurphy 0013	Review correspondence from T. Rafferty regarding demand and subpoena to B. Keilman.	0.30	76.50
10/10/13	goneil 0013	Strategize with Trustee about timing and contents of Complaints v. Insiders (.3); additional strategy with Trustee regarding Complaints (.2); create spreadsheet showing transfers to each of 5 founders by time period, for use in analyzing viable causes of action (1.1).	1.40	357.00
10/10/13	goneil 0013	Review emails with P. Bley regarding Mr. Keilman's equity infusion (.1) and follow up regarding Mr. Keilman's investment history	0.90	229.50

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		(.1); identify next steps to analyze causes of action (.1); review and assess Attorney Rafferty's response to Keilman demand letter (.2); strategize regarding fraudulent transfer counts v. Mr. Keilman (.4).		
10/11/13	jemurphy 0013	Exchange correspondence with Attorney Rafferty regarding documents requested in B. Keilman's 2004 Examination subpoena.	0.20	51.00
10/11/13	goneil 0013	Complete spreadsheet summary of transfers received by Founders per 1, 2, and 4 year period.	0.20	51.00
10/15/13	goneil 0013	Strategy regarding charts of payments to Founders by time period (.2); cross-check payment charts and identify discrepancies with K. Ellison payments (.6); strategize regarding impact of discrepancies and ways to address (.3); assist with message and review message to P. Bley regarding discrepancies (.2).	1.30	331.50
10/17/13	goneil 0013	Memorandum to Trustee regarding insider transfer status (.1) and follow up regarding same (.1); review memorandum from P. Bley regarding insider charts (.1).	0.30	76.50
10/18/13	jemurphy 0013	Review Attorney Rafferty's correspondence responding to B. Keilman's preference/fraud transfer demand; review detail of payments by B. Keilman to Direct Air and repayments. (.8)	0.80	204.00
10/18/13	goneil 0013	Review response from Attorney Rafferty to R. Keilman demand.	0.10	25.50
10/21/13	goneil 0013	Follow up regarding Mr. Keilman's response; consider next steps to address.	0.10	25.50
10/21/13	goneil 0013	Memorandum regarding Mr. Ellison's arrest and consider impact of same in Investigation context.	0.10	25.50
10/21/13	goneil 0013	Confer with Trustee regarding assessment of R. Keilman response.	0.10	25.50
10/22/13	goneil 0013	Strategize regarding claims against R. Keilman and develop preliminary questions for deposition based on his settlement proposal.	0.40	102.00
10/23/13	goneil 0013	Review mailed response letter from Attorney Rafferty regarding Mr. Keilman.	0.10	25.50
10/28/13	goneil 0013	Emails with Trustee regarding assessment of Mr. Keilman's preference demand response.	0.10	25.50
10/29/13	goneil 0013	Review and assess R. Keilman's response and offer letter, including to identify questions	2.00	510.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

and additional information needed regarding same (.7); create and assess spreadsheet of all payments to Mr. Keilman with 1-yr, 2-yr, and 4-yr pre-petition windows based on new total transfers spreadsheet from P. Bley (1.1); prepare for meeting with Trustee regarding R. Keilman analysis (.2).

10/31/13	goneil	0013	Confer with Trustee and litigation team regarding Mr. Keilman's response.	0.20	51.00
11/22/13	JHB	0013	Assess recovery grounds, collectability and devise complaint, resolution strategies, review underlying transfer materials.	0.60	234.00
11/27/13	cborourk	0013	Strategize with Attorney Murphy regarding corporate entities and principals in preparation of telephonic interviews.	0.50	95.00
12/02/13	cborourk	0013	Analyze corporate backgrounds in preparation for telephonic interview with Jeffry Conry.	0.90	171.00
12/03/13	cborourk	0013	Strategize with Attorney Murphy regarding association of various corporate entities.	0.50	95.00
12/06/13	JHB	0013	Review open issues and devise resolution strategies regarding open preference matter, and review defense materials.	0.30	117.00
12/06/13	goneil	0013	Review status of and potential for preference/transfer demands v. insiders, including founders and Avondale entities, in context of current developments and timing of investigation.	0.60	153.00
01/06/14	goneil	0013	Confer with Trustee to develop next steps regarding insider transfer recovery.	0.20	51.00
01/09/14	goneil	0013	Confer with Trustee regarding actions v. insiders.	0.10	25.50
01/24/14	goneil	0013	Review insider payment information, potential causes of action, and related case information in order to develop possible Complaints v. insiders.	1.30	331.50
01/30/14	goneil	0013	Develop strategies for preparing all insider complaints.	0.10	25.50
02/04/14	goneil	0013	Strategize regarding development of Complaints v. insiders (.3); confer with Trustee regarding same (.1).	0.40	102.00
02/11/14	JHB	0013	Review case materials and issues regarding actions v. insiders and devise complaint grounds.	0.60	234.00
02/11/14	goneil	0013	Review memorandum from Trustee regarding	1.30	331.50

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		development of Insider Complaints and follow up regarding same (.2); develop counts for all Insider Complaints, including to consider impact of "loans" or "investments" in same (.6); confer with Trustee regarding insider counts and related analysis (.2); follow up regarding next steps (.2); confer with Trustee regarding plan for next steps (.1).		
02/17/14	jemurphy 0013	Research and analyze causes of action against the Founding Members for conduct identified in the investigation report.	3.70	943.50
02/17/14	goneil 0013	Consider consolidated v. separate Complaints against the Founding members and causes of action for same.	0.30	76.50
02/20/14	RBG 0013	Strategic planning/discussion regarding claims against officers.	0.40	150.00
02/20/14	jemurphy 0013	Continue work identifying causes of action against the Founding Members, including evaluation of the applicable state and bankruptcy fraudulent transfer claims.	0.90	229.50
02/20/14	jemurphy 0013	Further strategy and research into claims against the Founding Members based on breach of fiduciary duty and other employer-employee claims for wrongful conduct in the course of their work.	1.20	306.00
02/20/14	goneil 0013	Strategize regarding development of claims.	0.20	51.00
02/21/14	jemurphy 0013	Research civil RICO claim and other causes of action against the Founding Members, including civil causes of action for actual fraud in falsifying Direct Air's business records.	2.90	739.50
02/21/14	goneil 0013	Strategize regarding potential RICO claims.	0.10	25.50
02/24/14	jemurphy 0013	Further legal and factual analysis of RICO claims against the Founding Members.	1.20	306.00
02/24/14	goneil 0013	Assist with development of RICO claims.	0.20	51.00
02/24/14	abaer 0013	Meeting with J. Murphy regarding possible RICO claim.	0.40	88.00
02/24/14	abaer 0013	Research federal case law regarding elements for a civil RICO claim; draft memorandum regarding same; conference with Attorney Murphy regarding same.	1.70	374.00
03/03/14	jemurphy 0013	Review and analyze Direct Air's payments to Keilman and his investments in Direct Air; calculate payments to Keilman by category of payment; communications with P. Bley regarding	2.60	663.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

	transfers from Direct Air accounts to all founding members.		
03/05/14 jemurphy 0013	Strategy regarding the founders's complaints and complaints against Avondale Aviation and personnel after the acquisition.	0.60	153.00
03/05/14 jemurphy 0013	Review backup documentation for transfers to B. Keilman; obtain and analyze payment to DA Consultant.	1.90	484.50
03/05/14 goneil 0013	Attention to receipt of backup documentation for insider Complaints.	0.10	25.50
03/06/14 jemurphy 0013	Review backup for transfers made to or on behalf of S. Ellison.	1.00	255.00
03/07/14 jemurphy 0013	Continue analysis of backup records of transfers to the founding members to support complaint damages; communications with P. Bley regarding the same.	0.70	178.50
03/10/14 jemurphy 0013	Phone call with P. Bley regarding back-up for transfers to/for founding members; review additional back-up documents.	2.60	663.00
03/11/14 cborourk 0013	Confirm property ownership of J. Tull in Myrtle Beach.	0.20	38.00
03/11/14 jemurphy 0013	Further review and organize back-up for transfers to all of the founding members and Avondale for use in Adversary Proceeding Complaint; evaluate payments as preferential or fraudulent transfers.	3.10	790.50
03/11/14 goneil 0013	Strategize regarding inclusion of claims and breakdowns of Complaints.	0.20	51.00
03/12/14 jemurphy 0013	Edit Adversary Proceeding Cover Sheet for all founding member complaints.	0.20	51.00
03/12/14 goneil 0013	Assist with filing and service logistics for all Complaints (.2); confer with Trustee regarding same (.1).	0.30	76.50
03/13/14 jemurphy 0013	Research RICO claim elements; research successor company's liability for breaching fiduciary duty and other negligence that deepened the insolvency; develop facts and draft adversary proceeding complaints against E. Warneck and S. Ellison, K. Ellison and J. Tull, and Avondale Aviation I; attending to filing verified adversary proceeding complaint.	7.50	1,912.50
03/13/14 goneil 0013	Assist with filing logistics regarding Complaints and preliminary injunction motions.	0.20	51.00
03/14/14 jemurphy 0013	Research law on standard for granting	6.10	1,555.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		preliminary injunction where inability to pay judgment in cause for irreparable harm; draft applications for preliminary injunction and proposed injunction orders against all founding members and Avondale Aviation I; review Court's notice regarding hearing on all applications for preliminary injunction and attend to service of the application and notice forthwith on all parties.		
03/14/14	goneil 0013	Assist with planning and noticing out of hearing information regarding Preliminary Injunction.	0.10	25.50
03/17/14	jemurphy 0013	Review and strategy regarding all elements of fraudulent transfers claims against the founding members; plan to amend adversary proceeding complaints to expressly allege antecedent debt.	0.60	153.00
03/17/14	goneil 0013	Attention to appearances in adversary proceeding.	0.10	25.50
03/18/14	jemurphy 0013	Begin to prepare argument for hearing on applications for preliminary injunctions.	0.20	51.00
03/18/14	jemurphy 0013	Communications with Attorney Boyd regarding J. Tull and the Ellisons' response to the complaint and application for preliminary injunction; update trustee.	0.50	127.50
03/19/14	goneil 0013	Assist with Preliminary Injunction hearing preparation.	0.10	25.50
03/20/14	jemurphy 0013	Prepare argument for hearings on preliminary injunctions/TROs against all founding members and Avondale Aviation; prepare agreed TRO for submittal to the court for J. Tull, the Ellisons and B. Keilman; review bankruptcy filing for E. Warneck.	1.30	331.50
03/20/14	jemurphy 0013	Attend hearing on Trustee's applications for preliminary injunction at the Worcester Bankruptcy Court; review the Court's orders after the hearing and attend to service of the Court orders.	2.50	637.50
03/20/14	goneil 0013	Attention to appearances in adversary proceeding.	0.10	25.50
03/21/14	jemurphy 0013	Evaluate claims against the founding members and Avondale and evidence required to prevail at trial; strategy regarding consolidation of the preliminary injunction with a trial on the	2.30	586.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

03/21/14	goneil	0013	merits as permissible in the Federal Rules. Strategize regarding issues related to consolidation of preliminary injunction hearing and trial for all three Founders' Complaints.	0.60	153.00
04/01/14	JHB	0013	Review service, recovery issues and strategies.	0.30	117.00
	TYPE	0013	TOTAL	81.80	20,872.00

TASK: 0014 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
139 JHB Joseph H. Baldiga	1.60	624.00	390.00
290 goneil Gina B. O'Neil	24.90	6,349.50	255.00
274 kmdellec Kimberly M. De	10.30	1,905.50	185.00
TYPE 0014 TOTAL	36.80	8,879.00	

Time Detail	Hours	Value
09/16/13 goneil 0014 Telephone call to Attorney Bartolomei (Tech Aviation) to follow up on his response (.1).	0.10	25.50
10/23/13 goneil 0014 Review Tech Aviation preference response status (.1), confer with Trustee regarding next steps (.1), and compile materials necessary to prepare Complaint (.2).	0.40	102.00
10/25/13 goneil 0014 Email M. Whitehouse to request payment backup (.1); investigate corporate status and identification information (.3); draft Complaint to recover preferences and require turnover of property of the Estate (1.2).	1.60	408.00
10/25/13 goneil 0014 Review and revise Adversary Proceeding Cover Sheet (.1); review, revise, and augment Complaint, including to review Bankruptcy Code sections regarding turnover of Estate property and disallowance of claims (1.0); confirm no proof of claim filed by defendant (.1).	1.20	306.00
10/28/13 goneil 0014 Follow up regarding defendant's claims and Complaint.	0.10	25.50
10/28/13 goneil 0014 Further revise Adversary Proceeding cover sheet (.1); review and further revise Complaint (.4).	0.50	127.50
10/29/13 goneil 0014 Review revised Complaint and further edit same.	0.10	25.50
10/30/13 goneil 0014 Review email from M. Whitehouse attaching	0.10	25.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		payment backup.		
10/31/13 JHB	0014	Review and revise complaint and review underlying transfer materials.	0.40	156.00
10/31/13 goneil	0014	Review and cross-check checks and wire backup and update Complaint to reference same.	0.60	153.00
10/31/13 goneil	0014	Revise exhibits (.2); finalize Complaint for Trustee's review (.1).	0.30	76.50
11/01/13 kmdellec	0014	Final review of cover sheet, complaint and exhibits and finalize for efilng.	0.30	55.50
11/01/13 kmdellec	0014	Draft transmittal letter to defendant enclosing complaint/summons; review file information and on-line search as to current address/registered agent/corporate officers of defendant.	0.70	129.50
11/01/13 goneil	0014	Attention to completion of exhibits to Complaint (.1); finalize Complaint package for filing (.1).	0.20	51.00
11/01/13 goneil	0014	Attend to filing of Complaint (.1); review summons and address administrative filing error to cause re-issuance (.2); review revised Summons and track answer deadline (.1).	0.40	102.00
11/04/13 goneil	0014	Assist with service of process.	0.10	25.50
11/04/13 goneil	0014	Review and revise Certificate of Service regarding Summons and transmittal letter.	0.20	51.00
11/05/13 kmdellec	0014	Finalize transmittal letter and summons for service and certificate of service for efilng; coordinate all.	0.50	92.50
11/06/13 goneil	0014	Review revised summons package and execute Certificate of Services.	0.10	25.50
11/11/13 kmdellec	0014	Track return of service.	0.10	18.50
11/14/13 kmdellec	0014	Receipt/track proof of service.	0.10	18.50
11/25/13 JHB	0014	Review transfer materials, answer issues.	0.20	78.00
11/25/13 kmdellec	0014	Review file information for correspondence to prior counsel.	0.30	55.50
11/25/13 goneil	0014	Telephone call with Attorney Bilowz regarding matter background and Answer deadline (.2); review prior correspondence in matter (.1) and draft memorandum to Trustee regarding extension, potential collectibility issues, and Stipulation to escrow funds (.2); follow up with Trustee regarding extension deadline (.1); review additional prior correspondence in matter and send package of same to Attorney Bilowz with matter summary and Answer deadline extension information (.4).	1.00	255.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee

14190 Direct Air (Southern Sky Air & Tours, LLC)

11/26/13	JHB	0014	Review open recovery issues and strategies to resolve.	0.20	78.00
12/02/13	goneil	0014	Review Answer to Complaint (.1); telephone call with Attorney Bilowz regarding Answer and next steps (.2); review Court's Pre-Trial Order (.1).	0.40	102.00
12/03/13	JHB	0014	Negotiations with Attorney Bilowz regarding avoidance action (.2), review underlying transfer, defense materials (.3).	0.50	195.00
12/03/13	goneil	0014	Review email from Attorney Bilowz regarding new value analysis (.1); email Trustee with initial assessment of same (.1).	0.20	51.00
12/06/13	JHB	0014	Review open issues and devise resolution strategies regarding open preference matter, and review defense materials.	0.30	117.00
12/06/13	goneil	0014	Track 26(f) conference deadline (.1); review and assess new value defense and develop recommendation regarding same (.3); draft response to Attorney Bilowz regarding new value, remaining issues, and next steps toward resolution (.4); confer with Trustee regarding response (.1); edit and send response to Attorney Bilowz regarding settlement negotiations (.1); update preference chart to reflect (.1).	1.10	280.50
12/11/13	goneil	0014	Review Corporate Ownership Statement and information about affiliate Niagara Falls Redevelopment, LLC (.1); update chart (.1).	0.20	51.00
12/26/13	goneil	0014	Email Attorney Bilowz to schedule 26(f) conference.	0.10	25.50
12/30/13	goneil	0014	Emails with Attorney Bilowz to schedule Rule 26(f) Conference.	0.10	25.50
12/31/13	goneil	0014	Prepare for 26(f) Conference including to review relevant Code sections and to develop list of discussion points (.6); conduct 26(f) Conference with Defendant's counsel (.4); provide summary to Trustee regarding same (.1).	1.10	280.50
01/02/14	goneil	0014	Prepare Initial Disclosures, including to review categories of documents in Trustee's possession (.3); prepare cover letter to Attorney Bilowz enclosing Initial Disclosures (.1); prepare draft 26(f) Conference Report and Certification (.7); calculate and track discovery-related deadlines from Pretrial Order	1.40	357.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		(.3).		
01/06/14	goneil	0014	Review timing of 26(f) Report and Initial Disclosures, in context of potential settlement terms.	0.10 25.50
01/06/14	goneil	0014	Review and revise Trustee's Initial Disclosures and cover letter regarding same (.1); review, revise, and augment draft 26(f) Conference Report (.4).	0.50 127.50
01/07/14	goneil	0014	Finalize and execute Initial Disclosures and cover letter to Attorney Bilowz (.1); finalize 26(f) Report for Trustee's review (.1); review and revise Certificate of Service regarding 26(f) Report (.1); implement Trustee's edits into 26(f) Report and finalize all documents to send to defendant (.1); email Initial Disclosures to Attorney Bilowz (.1).	0.50 127.50
01/08/14	goneil	0014	Email draft 26(f) Conference Report to Attorney Bilowz (.1); attention to discovery planning (.1).	0.20 51.00
01/10/14	kmdellec	0014	Review preference demand, complaint, answer and correspondence between trustee and defendant's counsel; draft request for production of documents, request for admissions and interrogatories.	3.60 666.00
01/10/14	goneil	0014	Emails with Attorney Bilowz regarding 26(f) Report (.1); finalize 26(f) Report for filing (.1); review and revise Certificate of Service (.1); attend to filing 26(f) Report (.1).	0.40 102.00
01/10/14	goneil	0014	Prepare materials for developing discovery requests.	0.20 51.00
01/14/14	goneil	0014	Review Defendant's Initial Disclosures from Attorney Bilowz.	0.10 25.50
01/21/14	goneil	0014	Review, revise, and augment Request for Production of Documents.	0.40 102.00
01/22/14	goneil	0014	Review discovery deadlines and emails with Attorney Bilowz regarding timing and status of potential settlement.	0.20 51.00
01/27/14	goneil	0014	Review timing and steps for discovery, in context of lack of settlement progress.	0.10 25.50
01/28/14	goneil	0014	Continue to review, revise, and develop discovery requests, including First Request for Production of Documents (.9); email Attorney Bilowz for update regarding settlement offer (.1); review, revise, and augment Plaintiff's	2.60 663.00

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		First Request for Admissions (.8); review, revise and augment Plaintiff's First Set of Interrogatories (.8)..		
01/30/14	goneil 0014	Review discovery strategy in context of Defendant's continuing lack of response regarding settlement.	0.10	25.50
01/31/14	goneil 0014	Further augment and develop discovery requests (documents, interrogatories, and admissions) and finalize same for review (1.2); implement suggested edits into discovery requests package and finalize documents for Defendant (.7); email P. Bilowz with discovery requests (.2).	2.10	535.50
02/04/14	goneil 0014	Review email from Atty. Bilowz regarding receipt of discovery requests and status of settlement.	0.10	25.50
02/06/14	goneil 0014	Review and consider settlement offer (.2); memoranda with Trustee regarding same (.2).	0.40	102.00
02/10/14	kmdellec 0014	Draft and review/revise settlement agreement; review background information in demands and complaint; obtain copy of proof of claim filed by Niagara from Pacer claims register.	1.50	277.50
02/10/14	goneil 0014	Review email from Atty. Bilowz regarding settlement offer (.1) and reply with counteroffer (.4); update chart to reflect same (.1).	0.60	153.00
02/11/14	goneil 0014	Emails with Atty. Bilowz regarding acceptance of settlement offer (.1); follow up regarding preparation of settlement agreement (.2).	0.30	76.50
02/20/14	kmdellec 0014	Track transmittal of proposed settlement agreement to defendant.	0.10	18.50
02/20/14	goneil 0014	Review and revise Settlement Agreement.	0.50	127.50
02/20/14	goneil 0014	Review Proof of Claim and revise and augment Stipulation to reflect allowance of a re-calculated portion of the Proof of Claim (.7); memorandum to Trustee regarding Proof of Claim calculations and corresponding Stipulation terms (.3); email draft to Atty. Bilowz for review (.1).	1.10	280.50
02/21/14	goneil 0014	Review email from Atty. Bilowz regarding status of Stipulation.	0.10	25.50
02/27/14	goneil 0014	Emails with Atty. Bilowz regarding settlement status.	0.10	25.50
03/03/14	goneil 0014	Execute Stipulation (.1); attend to receipt of funds and addressing settlement (.2).	0.30	76.50

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14190 Direct Air (Southern Sky Air & Tours, LLC)

03/05/14	kmdellec	0014	Draft approval motion, motion to limit, tolling agreement and certificate of service; review and revise all (x2).	1.80	333.00
03/06/14	goneil	0014	Emails with Atty. Bilowz regarding status of Stipulation (.1); assist with preparation of approval package (.1); consider addition of Tolling Agreement to package (.1).	0.30	76.50
03/07/14	kmdellec	0014	Forward fully executed copy of stipulation and tolling agreement to P. Bilowz via electronic mail.	0.10	18.50
03/07/14	goneil	0014	Correspondence with Atty. Bilowz regarding signed Stipulation.	0.10	25.50
03/07/14	goneil	0014	Review and revise Stipulation approval package, including Motion to Approve and Motion to Limit Notice.	0.90	229.50
03/07/14	goneil	0014	Review and revise settlement approval package (.2); finalize for filing and execute same (1.).	0.20	51.00
03/18/14	kmdellec	0014	Track/confirm order regarding motion to limit notice.	0.10	18.50
04/04/14	goneil	0014	Review Court's Order approving Stipulation and track Adversary Proceeding dismissal information.	0.10	25.50
04/11/14	kmdellec	0014	Review pacer docket and prepare stipulation of dismissal and certificate of service; review and revise same.	0.50	92.50
04/14/14	kmdellec	0014	Attention to revisions to Stipulation of Dismissal; forward to P. Bilowz via electronic mail for review and signature.	0.30	55.50
04/14/14	goneil	0014	Review and revise Stipulation of Dismissal (.1); review Bankruptcy Rules regarding dismissal and follow up regarding same (.1).	0.20	51.00
04/15/14	goneil	0014	Review emails with Defendant's counsel and execute Stipulation of Dismissal in connection with same.	0.10	25.50
04/22/14	kmdellec	0014	Track closure of adversary proceeding by Bankruptcy Court; review docket entry and determine to not file stipulation of dismissal.	0.30	55.50
04/22/14	goneil	0014	Follow up regarding Stipulation of Dismissal (.1); review Court's Order dismissing case and follow up regarding same (.1).	0.20	51.00
04/28/14	goneil	0014	Follow up regarding dismissal of Adversary Proceeding in context of Court's closing of cases, including to finalize filed documents.	0.20	51.00

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TYPE 0014 TOTAL 36.80 8,879.00

TASK: 0015 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
166 CED Christine E. Devine	0.20	77.00	385.00
139 JHB Joseph H. Baldiga	56.90	22,359.00	392.95
290 goneil Gina B. O'Neil	17.50	4,495.50	256.89
255 cborourk Cori B. O'Rour	6.00	1,140.00	190.00
281 jemurphy Jessica E. Mur	68.80	17,884.00	259.94
162 RBG Robert B. Gibbons	0.40	150.00	375.00
274 kmdellec Kimberly M. De	7.10	1,350.50	190.21
315 jjport Jason J. Port	0.40	92.00	230.00
349 AJF Allen Falke	1.60	560.00	350.00
325 kfoley Kate Foley	1.90	418.00	220.00

TYPE 0015 TOTAL 160.80 48,526.00

Time Detail	Hours	Value
10/08/13 goneil 0015 Attend to preparation of Complaint v. Mr. Keilman (.2).	0.20	51.00
10/09/13 goneil 0015 Assist with preparation of R. Keilman Complaint including to obtain backup documentation regarding same.	0.20	51.00
11/01/13 JHB 0015 Further assessment of asserted defenses and review of related case materials (.4), discussion with litigation team regarding recovery, discovery issues and strategies (.4).	0.80	312.00
11/01/13 goneil 0015 Review R. Keilman response materials in preparation to meet with Trustee (.2); confer with Trustee regarding Keilman response (.4).	0.60	153.00
11/05/13 goneil 0015 Email Attorney Rafferty regarding response to demand.	0.10	25.50
11/08/13 goneil 0015 Review emails regarding strategy and deposition results as related to Mr. Keilman.	0.10	25.50
11/12/13 cborourk 0015 Analyze Bob Keilman's expense reports and airline itineraries for the years 2006-2012 and chart same in preparation for deposition.	3.60	684.00
11/14/13 cborourk 0015 Draft chart of R. Keilman's Myrtle Beach trips for use at deposition.	0.60	114.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

11/14/13	goneil	0015	Review and assess financial documents signed by Mr. Keilman in 2008 regarding equity interest and CFO status.	0.20	51.00
11/15/13	goneil	0015	Memoranda regarding Merchant Agreement signatures.	0.10	25.50
11/18/13	cborourk	0015	Online research with Monmouth County, NJ Registry of Deeds to obtain deeds to R. Keilman's properties in Spring Lake and Marlboro; review encumbrances; discussions regarding fraudulent transfer.	0.90	171.00
11/18/13	goneil	0015	Assess information regarding personal financial statement.	0.10	25.50
11/20/13	JHB	0015	On Keilman, review Raftery proposal and devise response strategies, related emails with litigation team.	0.30	117.00
11/20/13	goneil	0015	Consider possibility of group resolution (.1); review email from Attorney Rafferty with loan documentation (.1); review and assess email proposal from Attorney Rafferty regarding global settlement, including information about assets (.2).	0.40	102.00
11/21/13	goneil	0015	Review email from Attorney Rafferty with new loan documents for Mr. Keilman.	0.10	25.50
11/22/13	cborourk	0015	Online research to obtain market value of properties previously owned by R. Keilman for potential fraudulent transfer claim.	0.40	76.00
11/26/13	goneil	0015	Draft proposed escrow language for Stipulation regarding Answer deadline and email Trustee regarding same.	0.20	51.00
12/11/13	JHB	0015	Review open preference issues, form of PFS.	0.20	78.00
12/11/13	goneil	0015	Identify and review form of personal financial statement for Mr. Keilman to fill out (.2); emails with Trustee regarding potential edits to same, and consider other potential edits based on fraudulent transfer laws (.2); email form to Attorney Rafferty (.1).	0.50	127.50
12/11/13	goneil	0015	Consider impact of H. Torbert interview and "triggering event" information on settlement discussions with Mr. Keilman.	0.10	25.50
12/17/13	jemurphy	0015	Phone call from B. Keilman regarding clarification of his follow up interview answers.	0.10	25.50
01/24/14	goneil	0015	Revise, develop, and augment draft Complaint v. Mr. Keilman, including to add background facts	4.40	1,122.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		and various counts, and to research addition of subordination related counts.		
02/04/14	goneil 0015	Attention to edits to Complaint.	0.10	25.50
02/04/14	goneil 0015	Review email from Trustee regarding Mr. Keilman's asset transfer.	0.10	25.50
02/11/14	JHB 0015	Devise complaint grounds v. Keilman and review underlying case materials.	0.60	234.00
02/13/14	goneil 0015	Review documentation supporting fraud charges.	0.10	25.50
02/17/14	goneil 0015	Review additional potential claims v. Mr. Keilman based on corporate entity status.	0.10	25.50
02/20/14	goneil 0015	Assist with finalizing Complaint.	0.10	25.50
02/21/14	goneil 0015	Strategize regarding claims v. Mr. Keilman, structure of Complaint, and next steps to finalize numbers.	0.50	127.50
02/25/14	jemurphy 0015	Edit and further draft adversary proceeding complaint against Robert Keilman for breach of fiduciary duty (to corporation and limited liability company), preference payments, and recovery of fraudulent transfers.	7.30	1,861.50
02/25/14	goneil 0015	Strategize regarding Complaint structure.	0.10	25.50
02/26/14	goneil 0015	Review and edit Complaint and provide memorandum with suggested edits.	1.70	433.50
02/28/14	jemurphy 0015	Edits to adversary proceeding complaint against Robert Keilman.	0.30	76.50
03/02/14	JHB 0015	Review and revise Keilman complaint, review underlying transfer materials.	0.90	351.00
03/03/14	jemurphy 0015	Review edits to be made to Keilman adversary proceeding complaint; strategy regarding prejudgment security options; edit complaint; strategy regarding claims and facts relevant to adversary proceedings against other founding members.	0.70	178.50
03/03/14	goneil 0015	Review Trustee's edits to Complaint and assist with strategy for finalizing Complaint (.4); review final numbers for Complaint (.2).	0.60	153.00
03/05/14	goneil 0015	Strategize regarding timing of filing Complaint and inclusion of exhibits with Complaint.	0.30	76.50
03/07/14	goneil 0015	Review memoranda regarding backup documents for Complaints.	0.10	25.50
03/11/14	goneil 0015	Review and edit portions of Complaint.	0.20	51.00
03/12/14	JHB 0015	Review and revise modified complaint, injunction request.	0.40	156.00
03/12/14	kmdellec 0015	Prepare adversary proceeding cover sheet.	0.20	37.00
03/12/14	jemurphy 0015	Edit and further draft Adversary Proceeding	4.60	1,173.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

Complaint against B. Keilman.

03/12/14	goneil	0015	Assist with preparation of AP Cover Sheet.	0.20	51.00
03/13/14	JHB	0015	Review final form of complaint, underlying transfer materials, execute verification.	0.40	156.00
03/13/14	kmdellec	0015	Prepare Declaration regarding electronic filing regarding Keilman verified complaint and assist with efilng same; assist with preparation of application for injunctive relief and proposed order.	0.50	92.50
03/13/14	goneil	0015	Review memoranda with Trustee regarding Keilman Complaint (.1); provide advice regarding signatures and electronic filing for Verified Complaints.	0.20	51.00
03/14/14	kmdellec	0015	Attention to notice of emergency hearing regarding preliminary injunction and notice of same.	0.20	37.00
03/17/14	kmdellec	0015	Review supplemental certificate of service regarding notice of emergency hearing regarding preliminary injunction.	0.10	18.50
03/18/14	JHB	0015	Call, emails with Attorney Madoff regarding complaint, injunction issues, review proposed language from same for injunction order.	0.40	156.00
03/18/14	kmdellec	0015	Attention to ECF notice for J. Baldiga and G. O'Neil.	0.10	18.50
03/18/14	jemurphy	0015	Phone call with Attorney Madoff regarding agreement to enter TRO with R. Keilman.	0.40	102.00
03/18/14	goneil	0015	Assist with Keilman matter analysis.	0.10	25.50
03/26/14	goneil	0015	Assist with personal financial statement and settlement information needed.	0.10	25.50
04/10/14	jemurphy	0015	Communications with Attorney Madoff regarding extension of answer deadline; review proposed extension motion.	0.20	51.00
04/21/14	goneil	0015	Review Motion to Dismiss.	0.10	25.50
04/22/14	JHB	0015	Call, emails with Attorney Madoff regarding settlement negotiations, additional information required (.7), review underlying transfer, defense issues and materials (.4).	1.10	429.00
04/22/14	JHB	0015	Review dismissal, reference motions and devise response strategies.	0.40	156.00
04/22/14	jemurphy	0015	Review and begin to analyze argument in Keilman's Motion to Dismiss and Motion to Withdraw the Reference; statutory and case law research on South Carolina fraudulent transfer statute; research procedure for Motion to	2.30	586.50

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		Withdraw the Reference and timing of opposition.		
04/22/14	jemurphy 0015	Phone call with Attorney Madoff regarding Keilman's settlement offer; review Keilman's financials; analyze the Trustee's ability to recover from Keilman's assets.	1.20	306.00
04/22/14	jemurphy 0015	Communications with D. Madoff regarding Keilman's settlement offer.	0.50	127.50
04/22/14	goneil 0015	Strategize regarding Motion to Dismiss (.1); strategy regarding withdrawal of reference (.1); telephone call with Atty. Madoff regarding potential settlement (.2).	0.40	102.00
04/23/14	JHB 0015	Further analysis regarding dismissal motion, settlement offer and devise information requests (.3); related call with Attorney Madoff (.3).	0.60	234.00
04/23/14	RBG 0015	Strategy planning regarding claims/settlement/financial disclosure.	0.20	75.00
04/24/14	goneil 0015	Strategize regarding settlement offer and bankruptcy.	0.10	25.50
04/25/14	JHB 0015	Continued attention to document production, settlement issues and strategies.	0.30	117.00
04/25/14	RBG 0015	Strategy planning/discussion regarding resulting trust claim.	0.20	75.00
04/25/14	jemurphy 0015	Communications with Attorney Madoff regarding Keilman's financial records to evaluate settlement with; communications with Attorney Rafferty regarding settlement; evaluate settlement parameters in light of Keilman's assets and discussions with the Trustee regarding the same.	0.60	153.00
04/28/14	JHB 0015	Continued attention to pretrial, settlement issues, strategies and negotiations.	0.30	117.00
04/28/14	cborourk 0015	Online research regarding current property values of Keilman properties in Marlboro and Spring Lake, NJ; obtain market value of both properties; update memorandum of assets.	0.50	95.00
04/28/14	jemurphy 0015	Review real estate and other assumed assets of B. Keilman; draft correspondence to Attorney Rafferty with Trustee's settlement counteroffer and basis for the same.	0.50	127.50
04/29/14	JHB 0015	Continued analysis, strategies regarding settlement parameters and rationale and open discovery, recovery issues.	0.30	117.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

04/29/14	jemurphy	0015	Ongoing strategy regarding R. Keilman's settlement position and negotiations.	0.20	51.00
04/29/14	goneil	0015	Strategize regarding settlement negotiations, especially in context of Mr. Keilman's family assets.	0.20	51.00
04/30/14	jemurphy	0015	Phone call from Attorney Madoff regarding Keilman's settlement position and counteroffer.	0.30	76.50
05/01/14	JHB	0015	Continued review and assessment of defense assertions, settlement proposals, and devise response strategies.	0.40	156.00
05/01/14	jemurphy	0015	Initial evaluation of Keilman's settlement offer; draft memorandum to Trustee regarding the same.	0.50	127.50
05/01/14	jemurphy	0015	Attend to continuing deadlines for pending motions filed by R. Keilman.	0.20	51.00
05/01/14	goneil	0015	Review Trustee's memoranda regarding settlement status and plans for next steps (.1); strategize regarding withdrawal of reference and extension motion (.2).	0.30	76.50
05/01/14	kfoley	0015	Strategize regarding continuance of Trustee's deadlines in pending adversary proceeding and attention to next steps regarding drafting motion to continue Trustee's deadlines in pending adversary proceeding.	0.20	44.00
05/02/14	kfoley	0015	Telephone calls to case administrator regarding status of Defendant's pending Motion for Withdrawal of Reference and parties' intention to extend deadlines and reschedule hearing regarding Defendant's pending Motion to Dismiss Adversary Proceeding.	0.20	44.00
05/02/14	kfoley	0015	Review of procedural background of pending adversary proceeding (.1); draft, review and revise Trustee's Assented-to Motion to extend response deadlines related to motions pending in adversary proceeding and continue hearing on Defendant's Motion to Dismiss (.7).	0.80	176.00
05/02/14	kfoley	0015	Draft proposed Order extending Trustee's response deadlines related to motions in pending adversary proceeding and continuing hearing on Defendant's Motion to Dismiss (.4); review of and revise Trustee's Assented-to Motion to extend response deadline related to motions pending in adversary proceeding and continue hearing on Defendant's Motion to	0.70	154.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

Dismiss (.3).

05/05/14	JHB	0015	Continued negotiations, strategies, assessment of defenses.	0.40	156.00
05/05/14	jemurphy	0015	Draft Motion to Continue Trustee's Opposition to Keilman's Motions; communications with Attorney Madoff regarding the same and on-going settlement discussion.	0.70	178.50
05/08/14	kmdellec	0015	Finalize and attention to efilng/service of notice of (a) extended objection deadline and (b) continued hearing.	0.20	37.00
05/08/14	jemurphy	0015	Communications with Attorney Madoff regarding Preliminary Injunction hearing against Keilman.	0.10	25.50
05/12/14	JHB	0015	Continued attention to open settlement, payment, extension issues, strategies if no resolution, and review related emails, discovery from opposing counsel.	0.30	117.00
05/15/14	JHB	0015	Further review of open issues, settlement negotiations, assess defenses and devise strategies to resolve; review related discovery issues, opposing counsel emails.	0.30	117.00
05/16/14	JHB	0015	Continued negotiations with opposing counsel.	0.20	78.00
05/16/14	jemurphy	0015	Further strategy with Trustee regarding settlement efforts and position with respect to Keilman.	0.20	51.00
05/19/14	JHB	0015	Continue settlement negotiations and devise response strategies regarding dismissal and reference withdrawal motions.	0.60	234.00
05/19/14	JHB	0015	Research regarding resulting trusts.	0.60	234.00
05/20/14	JHB	0015	Continued assessment of defenses, responses and devise strategies to resolve, further trust research.	0.60	234.00
05/21/14	JHB	0015	Review open discovery, settlement issues and strategies.	0.20	78.00
05/21/14	jemurphy	0015	Strategy regarding settlement parameters for R. Keilman.	0.10	25.50
05/23/14	JHB	0015	Continued attention to open discovery, settlement issues, strategies and related emails.	0.20	78.00
05/27/14	kmdellec	0015	Determine and obtain copies of all asserted tax claims in connection with settlement.	1.50	277.50
05/27/14	jemurphy	0015	Phone call to Attorney Boyd regarding interview with J. Tull regarding B. Keilman's role.	0.10	25.50
05/27/14	jemurphy	0015	Research South Carolina fraudulent transfer law and New Jersey constructive trust law; draft	3.50	892.50

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		detailed settlement counteroffer and explanation to Attorney Madoff.		
05/28/14	JHB 0015	Continued strategies, document review and settlement parameters.	0.40	156.00
05/28/14	jemurphy 0015	Prepare for and phone call with J. Tull regarding R. Keilman's involvement in Direct Air and loans to the Debtor.	0.80	204.00
05/28/14	jemurphy 0015	Phone calls with Attorney Madoff regarding Keilman's settlement response.	0.10	25.50
05/28/14	jemurphy 0015	Further strategy regarding Keilman settlement and next steps if settlement rejected.	0.30	76.50
05/29/14	JHB 0015	Continue negotiations, defense and recovery assessment and review related issues and documents.	0.80	312.00
05/29/14	jemurphy 0015	(Keilman) Phone call with Attorney Madoff regarding B. Keilman's settlement counter-offer and settlement considerations; begin to evaluate settlement considerations, including impact of a bankruptcy filing by B. Keilman and personal liability for the Direct Air tax claims; draft correspondence to Attorney Madoff regarding the same.	1.80	459.00
05/29/14	goneil 0015	Strategize regarding Mr. Keilman's IRA and related preliminary injunction issues, including anticipated arguments from Mr. Keilman.	0.30	76.50
05/30/14	JHB 0015	Continued analysis and strategies regarding settlement parameters, potential tax liabilities of Mr. Keilman, counteroffer issues.	0.40	156.00
05/30/14	kmdellec 0015	Calendar ahead regarding receipt of substantiation of Keilman's personal tax exposure from Attorney Madoff.	0.10	18.50
05/30/14	kmdellec 0015	Review pacer docket and update litigation control sheet accordingly.	0.20	37.00
05/30/14	goneil 0015	Assist with analysis of tax claims v. Mr. Keilman (.1); review memorandum regarding settlement and liabilities (.1).	0.20	51.00
06/02/14	JHB 0015	Continue negotiations, review additional materials from Attorney Madoff and related tax issues and materials, devise settlement strategies.	0.60	234.00
06/02/14	kmdellec 0015	Additional updates to litigation control sheet.	0.10	18.50
06/02/14	jemurphy 0015	Communications with Attorney Madoff regarding	0.10	25.50

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		status of response to the Trustee's request for additional information from the Keilmans.		
06/03/14	JHB	0015	Continued attention to settlement parameters and support, related emails from Attorney Madoff.	0.30 117.00
06/06/14	JHB	0015	Extensive negotiations and review of defenses, tax implications and multiple emails with Attorney Madoff, discussions with Attorney Murphy.	1.10 429.00
06/06/14	jemurphy	0015	Multiple communications with Attorney Madoff and the Trustee regarding the Keilmans' financial information in support of R. Keilman's settlement offer and ongoing settlement negotiations; strategy regarding extending current motion dates while settlement ongoing.	0.40 102.00
06/06/14	goneil	0015	Strategize regarding settlement negotiations.	0.10 25.50
06/10/14	JHB	0015	Strategies regarding upcoming deadlines and hearings (injunction, dismissal and reference motion) (.3); assess asserted defenses, trust issues (.4); lengthy call with Attorney Madoff regarding information production, resolution parameters and tax claim issues, and next steps (.8), follow up analysis and strategies (.3).	1.80 702.00
06/10/14	jemurphy	0015	Strategy with trustee regarding settlement with Keilman.	0.20 51.00
06/10/14	jemurphy	0015	Telephone call with Attorney Madoff regarding settlement negotiations and next steps in the litigation.	0.70 178.50
06/11/14	JHB	0015	Review, revise proposed confidentiality agreement, impending deadlines, strategies to address and related resolution parameters.	0.90 351.00
06/11/14	jemurphy	0015	Analyze proposed Confidentiality Agreement and restriction on use of Keilmans' financial data; edits to Confidentiality Agreement.	0.30 76.50
06/12/14	JHB	0015	Continued attention to confidentiality agreement issues and revisions, related document production, extension issues, continued Madoff emails.	0.60 234.00
06/12/14	goneil	0015	Telephone call from Bankruptcy Court clerk regarding evidentiary hearing (.1); memorandum to Trustee regarding same (.1).	0.20 51.00
06/13/14	JHB	0015	Begin review of additional information from Attorney Madoff and devise litigation,	0.80 312.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

06/13/14 jemurphy 0015	settlement strategies. Draft Motion to Continue Temporary Restraining Order and Preliminary Injunction hearing; evaluate opposition deadline and hearing dates for Defendant's Motion to Dismiss and Motion to Withdraw the Reference; communications with Attorney Madoff regarding the same and proposed Confidentiality Agreement.	1.30	331.50
06/13/14 goneil 0015	Strategize regarding global continuance motion.	0.10	25.50
06/14/14 JHB 0015	Review additional materials, strategies regarding settlement parameters.	0.30	117.00
06/16/14 JHB 0015	Continued review of new financial information, settlement strategies.	0.30	117.00
06/16/14 jemurphy 0015	Communications with Attorney Sheatsley regarding interview of K. Ellison regarding questions on Keilman's role in Direct Air.	0.10	25.50
06/17/14 JHB 0015	Continued analysis, devise strategies regarding settlement, litigation, tax lien issues.	0.40	156.00
06/17/14 JHB 0015	Confer with Attorney Murphy regarding financial information, discovery and resolution issues and strategies (.3); review additional information from Attorney Madoff (.2).	0.50	195.00
06/17/14 jemurphy 0015	Preparation for and telephone call with K. Ellison and Attorney Sheatsley regarding B. Keilman's role as CFO, involvement with fraudulent conduct and loans to Direct Air.	0.80	204.00
06/17/14 jemurphy 0015	Review additional financial information from Attorney Madoff; evaluate settlement with the Trustee; communications with Attorney Madoff regarding extension of pending adversary process deadlines.	0.40	102.00
06/19/14 JHB 0015	Continued attention to settlement, objection issues and strategies.	0.30	117.00
06/20/14 jemurphy 0015	Draft motion to extend opposition deadlines on the Defendant's motions and to continue the hearing date on all pending motions; communications with Attorney Madoff regarding the same.	1.90	484.50
06/23/14 JHB 0015	Continue review of financial materials, strategies for settlement, further discovery.	0.40	156.00
06/23/14 goneil 0015	Review status of matter and Court's Order regarding dismissal and withdrawal of reference.	0.10	25.50
06/24/14 JHB 0015	Continue review of financial and defense	1.10	429.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		materials and issues, craft and send counterproposal to Attorney Madoff.		
06/24/14	jemurphy 0015	Analyze IRS claim on R. Keilman and IRS' enforcement options; strategy with Trustee regarding settlement with R. Keilman; review further settlement offer to R. Keilman.	0.90	229.50
06/24/14	jjport 0015	Strategy regarding tax consequences and IRS recovery options for Keilman's responsibility for Direct Air taxes.	0.40	92.00
06/26/14	JHB 0015	Continue review of defenses, financial materials, response strategies regarding dismissal and reference motions, and devise settlement strategies.	0.60	234.00
06/27/14	JHB 0015	Review open settlement issues, next steps if no resolution.	0.20	78.00
06/27/14	jemurphy 0015	Review status of settlement efforts.	0.10	25.50
06/28/14	JHB 0015	Review open settlement, pretrial issues, next steps in light of no response from Attorney Madoff.	0.20	78.00
06/28/14	goneil 0015	Review memoranda regarding case status and negotiations.	0.10	25.50
06/30/14	JHB 0015	Continued negotiations with Attorney Madoff (.3) and address open issues, deadlines regarding responses to pretrial motion (.2).	0.50	195.00
06/30/14	kmdellec 0015	Review status of case/update litigation control sheet accordingly.	0.20	37.00
06/30/14	goneil 0015	Review memoranda regarding settlement negotiations.	0.10	25.50
07/03/14	JHB 0015	Review Madoff counteroffer, devise response to same.	0.30	118.50
07/06/14	JHB 0015	Further analysis regarding defenses, settlement counteroffer, response strategy.	0.30	118.50
07/07/14	JHB 0015	Continued negotiations with Attorney Madoff and related assessment of defenses, assets, competing claims.	0.80	316.00
07/07/14	jemurphy 0015	Further settlement negotiations and evaluation of the parties' settlement positions with the Trustee.	0.30	79.50
07/07/14	goneil 0015	Review settlement offer from Atty. Madoff.	0.10	26.50
07/08/14	JHB 0015	Evaluate latest counteroffer from Attorney Madoff and devise response strategies.	0.30	118.50
07/09/14	JHB 0015	Continued negotiations, review open discovery issues.	0.80	316.00
07/09/14	JHB 0015	Craft counterproposal to Attorney Madoff,	0.90	355.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		further analysis regarding constructive trust/continuing concealment (.6), lengthy call with Attorney Madoff (.3).		
07/09/14	jemurphy 0015	Review draft Amended Complaint; edit and further draft Motion to Amend Complaint and Certain Pre-Trial Order Deadlines.	1.80	477.00
07/09/14	jemurphy 0015	Evaluation of further settlement discussions and positions with Attorney Madoff.	0.10	26.50
07/10/14	JHB 0015	Continued negotiations with Attorney Madoff via calls and emails and make counteroffer, assess litigation issues and strategies and next steps if no settlement.	1.40	553.00
07/10/14	CED 0015	Analysis of potential settlement; consider options related to further negotiations.	0.20	77.00
07/10/14	jemurphy 0015	Review further settlement discussions and strategy regarding settlement position with R. Keilman.	0.40	106.00
07/10/14	jemurphy 0015	Strategy regarding additional settlement payment trigger options based on B. Keilman financials.	0.30	79.50
07/10/14	goneil 0015	Review memoranda regarding settlement negotiations.	0.10	26.50
07/11/14	JHB 0015	Continued negotiations with Attorney Madoff, reach tentative agreement (.6), related emails with same and Mr. Jalbert (.3).	0.90	355.50
07/11/14	goneil 0015	Review memorandum regarding status of negotiation.	0.10	26.50
07/14/14	goneil 0015	Review memorandum regarding settlement.	0.10	26.50
07/15/14	kmdellec 0015	Assist with efilng of assented-to motion to further extend deadline to object to motion to dismiss/continue hearing; review Bankruptcy Court's suggestion regarding separate filings.	0.30	58.50
07/15/14	jemurphy 0015	Draft Motion to Extend Deadlines; communications with Attorney Madoff regarding further extending pending motion dates while settlement pending; attend to filing Motion to Extend Deadlines.	0.60	159.00
07/15/14	goneil 0015	Strategize regarding Response to Mr. Keilman's extension motion (.1); assist with mechanics of pleading and proposed Order (.1).	0.20	53.00
07/16/14	JHB 0015	Continued negotiations with Attorney Madoff (.2), analysis, strategies regarding tax issues, extension and pretrial issues (.3).	0.50	197.50
07/18/14	JHB 0015	Review open settlement issues, drafting and	0.30	118.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

07/21/14 JHB	0015	release strategies. Lengthy continued negotiations with Attorney Madoff regarding possible settlement (calls and emails), review additional transfer materials, possible defense, response grounds regarding preference, dismissal motions (2.1); related emails with Mr. Jalbert regarding tax assessment trigger, issues (.3).	2.40	948.00
07/21/14 jemurphy	0015	Communications with Attorney Madoff regarding terms of settlement, including trigger for additional payment based on R. Keilman's tax liability; review details of Direct Air's tax liability for which R. Keilman has personal responsibility.	0.40	106.00
07/21/14 goneil	0015	Strategize regarding settlement and steps to address.	0.20	53.00
07/22/14 JHB	0015	Continue negotiations with Attorney Madoff (.3), related emails with Ms. Jalbert (.2); assess additional grounds for opposition to dismissal, reference motions (.3).	0.80	316.00
07/23/14 JHB	0015	Continued negotiations with Attorney Madoff (.3); assess deadlines, strategies regarding responses to dismissal, reference motions (.3).	0.60	237.00
07/24/14 JHB	0015	Continued settlement emails with Attorney Madoff.	0.20	79.00
07/25/14 JHB	0015	Continued negotiations with Attorney Madoff and reach settlement (.4); attention to drafting, approval considerations (.2).	0.60	237.00
07/25/14 kmdellec	0015	Review status of case and update control chart accordingly.	0.20	39.00
07/25/14 jemurphy	0015	Review final settlement terms.	0.10	26.50
07/28/14 kmdellec	0015	Review revisions to updated control chart.	0.10	19.50
08/04/14 JHB	0015	Review open issues, next steps in recovery action and strategies for resolution.	0.20	79.00
08/04/14 jemurphy	0015	Analyze IRS' process for "assessment" of taxes for use in B. Kielman settlement.	0.40	106.00
08/04/14 jemurphy	0015	Draft Motion to Approve Stipulation and Stipulation of Settlement with B. Keilman.	2.40	636.00
08/05/14 JHB	0015	Continued revisions to settlement materials, attention to approval basis.	0.30	118.50
08/05/14 jemurphy	0015	Further draft Stipulation of Settlement and Notice to Approve Stipulation with R. Keilman.	0.60	159.00
08/06/14 jemurphy	0015	Follow-up with Attorney Madoff regarding settlement documents.	0.10	26.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

08/07/14 jemurphy 0015	Review correspondence from Attorney Madoff regarding draft Stipulation of Settlement; review IRS paperwork regarding Direct Air's trust fund taxes and intention to assess on founding members; review IRS assessment process and strategy regarding alternative definition of assessment for Stipulation of Settlement.	2.40	636.00
08/07/14 AJF 0015	Discussions related to "assessment" and research on statute of limitations related to assessment.	0.80	280.00
08/08/14 JHB 0015	Evaluate Attorney Madoff comments to proposed settlement agreement, devise response strategies.	0.30	118.50
08/08/14 jemurphy 0015	Phone call with C. Jalbert regarding assessed taxes.	0.30	79.50
08/08/14 jemurphy 0015	Phone call with Attorney Madoff regarding issues with definition of "assessed" in Stipulation of Settlement; discuss financial information to include in Motion to Approve.	0.40	106.00
08/08/14 goneil 0015	Strategize regarding settlement and grounds for approval of same.	0.10	26.50
08/10/14 JHB 0015	Further emails regarding settlement, release terms.	0.20	79.00
08/11/14 JHB 0015	Continued attention to settlement terms, approval strategies, devise response to Madoff comments, review additional asset, liability materials.	0.60	237.00
08/11/14 jemurphy 0015	Review information from Attorney Madoff regarding settlement.	0.10	26.50
08/12/14 JHB 0015	Continued attention to settlement terms and strategies and response to Attorney Madoff (.3); review next steps if no settlement regarding oppositions, grounds (.2).	0.50	197.50
08/12/14 jemurphy 0015	Draft response to Attorney Madoff regarding definition of "assess" in Stipulation with Keilman.	0.30	79.50
08/14/14 JHB 0015	Continued negotiations with Attorney Madoff regarding settlement terms (.6); review next steps, deadlines, opposition grounds if no settlement (.3).	0.90	355.50
08/18/14 JHB 0015	Continued negotiations with Attorney Madoff.	0.20	79.00
08/19/14 JHB 0015	Further negotiations with Attorney Madoff (.1); review next steps in litigation, oppositions (.1).	0.20	79.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee

14190 Direct Air (Southern Sky Air & Tours, LLC)

08/19/14 jemurphy 0015	Review status of settlement and next steps if no settlement.	0.10	26.50
08/21/14 JHB 0015	Research and analysis regarding IPD defense, dismissal and reference motions (1.1); strategize with Attorney Murphy regarding responses to same (.3).	1.40	553.00
08/21/14 jemurphy 0015	Review Motion to Withdraw the Reference.	0.50	132.50
08/23/14 JHB 0015	Analyze reference, dismissal motions, devise response strategies, memos with litigation team regarding same.	0.80	316.00
08/25/14 jemurphy 0015	Strategy regarding opposing and partially stipulating to certain relief in Keilman's pending motions.	0.30	79.50
08/26/14 JHB 0015	Review open recovery issues, next steps.	0.20	79.00
08/27/14 JHB 0015	Continued strategies regarding responses to reference and dismissal motions.	0.40	158.00
08/27/14 jemurphy 0015	Communications with Attorney Madoff regarding B. Keilman's pending Motions.	0.10	26.50
08/28/14 JHB 0015	Continue analysis, research, strategizing with litigation counsel regarding responses to reference, dismissal motions.	0.60	237.00
08/28/14 jemurphy 0015	Research law in opposition to Defendant's Motion to Withdraw the Reference and Motion to Dismiss.	2.40	636.00
08/29/14 JHB 0015	Review and revise responses to reference, dismissal motions including review of case materials and related research, analysis (1.6), strategize with Attorney Murphy regarding discovery, recovery issues (.3).	1.90	750.50
08/29/14 kmdellec 0015	Review adversary proceeding and main case dockets and update litigation control sheet accordingly.	0.10	19.50
08/29/14 jemurphy 0015	Research and analyze case law in support of opposition to Defendant's Motion to Dismiss and Motion to Withdraw the Reference; outline and draft arguments for opposition motions.	10.60	2,809.00
08/30/14 JHB 0015	Further analysis, document review regarding recovery issues.	0.30	118.50
09/04/14 JHB 0015	Review open dismissal, injunction issues, strategies and related Madoff emails.	0.40	158.00
09/04/14 kmdellec 0015	Telephone call (x2) to case administrator to confirm hearing on preliminary injunction.	0.30	58.50
09/04/14 jemurphy 0015	Communications with Attorney Madoff regarding status of hearing of Trustee's Application for	0.20	53.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		Preliminary Injunction and impact of B. Keilman's arguments in his Motion to Dismiss on existing Temporary Restraining Order.		
09/08/14	JHB 0015	Continued negotiations regarding settlement (.3); review District Court notice, implications and strategies for 10/1 dismissal hearing (.3).	0.60	237.00
09/08/14	jemurphy 0015	Review U.S. District Court docket and next steps in the litigation.	0.20	53.00
09/08/14	jemurphy 0015	Strategy regarding further settlement offer to B. Keilman.	0.10	26.50
09/08/14	goneil 0015	Review status of negotiations.	0.10	26.50
09/09/14	JHB 0015	Conference with Attorney Murphy regarding discovery, litigation and resolution issues and strategies.	0.30	118.50
09/09/14	goneil 0015	Strategize regarding renewed settlement offer.	0.10	26.50
09/10/14	JHB 0015	Continued negotiations with Attorney Rafferty and review underlying case materials.	1.30	513.50
09/10/14	jemurphy 0015	Evaluation of B. Keilman's counteroffer.	0.40	106.00
09/10/14	goneil 0015	Review memoranda between Trustee and counsel regarding settlement negotiations.	0.10	26.50
09/10/14	AJF 0015	Discussion related to calculation of tax payments.	0.20	70.00
09/10/14	AJF 0015	Discussion related to settlement and payment of tax liability.	0.20	70.00
09/11/14	JHB 0015	Continued negotiations with Attorney Rafferty (.6) and review related defense, tax issues and materials (.3).	0.90	355.50
09/11/14	jemurphy 0015	Analysis of settlement communications and further settlement terms from Attorney Rafferty.	0.60	159.00
09/12/14	JHB 0015	Continued negotiations with Attorney Rafferty, reach settlement, and devise related approval strategies.	1.10	434.50
09/12/14	jemurphy 0015	Review further settlement communications; review final offer terms with Trustee.	0.30	79.50
09/15/14	JHB 0015	Review additional settlement terms, release issues and approval strategies.	0.30	118.50
09/15/14	jemurphy 0015	Review timing considerations for settlement.	0.10	26.50
09/15/14	goneil 0015	Strategize regarding structure and timing of settlement in Bankruptcy Court.	0.20	53.00
09/16/14	JHB 0015	Continue review of open settlement issues, related release requirements.	0.20	79.00
09/16/14	jemurphy 0015	Draft Stipulation of Settlement and Motion to	1.40	371.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

Approve Stipulation.

09/17/14 JHB	0015	Continued attention to release, payment issues.	0.20	79.00
09/18/14 JHB	0015	Revise settlement agreement and related approval pleadings and review underlying settlement materials (1.1); strategies to address pending discovery, hearing issues (.2).	1.30	513.50
09/18/14 kmdellec	0015	Telephone call to case administrator to determine day of week that motions are heard by Judge Hoffman.	0.10	19.50
09/18/14 goneil	0015	Assist with strategy for modifying TRO to permit withdrawal of settlement funds.	0.10	26.50
09/19/14 jemurphy	0015	Edit Stipulation of Settlement and Motion to Approve Stipulation; communications with Attorney Rafferty regarding timing for review and filing the same; review timing of hearings and funding settlement.	0.40	106.00
09/22/14 JHB	0015	Review open settlement issues and related approval, timing issues.	0.10	39.50
09/22/14 jemurphy	0015	Edits to Stipulation of Settlement; Motion to Approve Stipulation and Motion to Modify Temporary Restraining Order; communications with Attorney Rafferty regarding the same.	0.40	106.00
09/24/14 JHB	0015	Review additional hearing, settlement issues and strategies, related motion, emails from defendant's counsel.	0.40	158.00
09/24/14 jemurphy	0015	Review defendant's draft Motion to Continue hearing on defendant's Motion to Dismiss.	0.20	53.00
09/25/14 JHB	0015	Continued negotiations regarding POA request and related tax issues, funding and release issues.	0.80	316.00
09/25/14 kmdellec	0015	Track order allowing continuance of hearing on motion to dismiss; strategy regarding filing of settlement pleadings; calendar ahead regarding deadline for filing settlement pleading.	0.30	58.50
09/25/14 jemurphy	0015	Review correspondence from Attorney Rafferty regarding access to Debtor's tax information; review proposed IRS Power of Attorney Form; strategy regarding access to grant to B. Keilman; further communications with Attorney Rafferty regarding other terms of the settlement.	0.40	106.00
09/26/14 JHB	0015	Continued attention to open settlement, POA terms.	0.30	118.50
09/30/14 JHB	0015	Review defendant comments to settlement	0.60	237.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		agreement and related emails with Attorney Murphy.		
10/01/14	JHB 0015	Continued revisions, negotiations regarding settlement terms, related research, review of financial information regarding approval grounds.	0.90	355.50
10/01/14	jemurphy 0015	Strategy regarding proposed settlement terms with the Trustee; phone call with Attorney Rafferty; further strategy regarding settlement terms.	1.00	265.00
10/01/14	goneil 0015	Strategize about format of Stipulation and representations by Mrs. Keilman.	0.10	26.50
10/09/14	JHB 0015	Review litigation, settlement status and next steps.	0.20	79.00
10/10/14	JHB 0015	Review revised POA and settlement agreement, underlying release and funding issues, and devise strategies to resolve impediments.	0.80	316.00
10/10/14	jemurphy 0015	Edit Stipulation of Settlement and IRS form to access debtor's tax information.	1.50	397.50
10/11/14	JHB 0015	Review additional settlement, release issues, related emails with Attorney Murphy regarding resolution strategies.	0.30	118.50
10/14/14	JHB 0015	Review open release, settlement issues, next steps to resolve.	0.20	79.00
10/15/14	JHB 0015	Review additional revisions to stipulation, related release and POA issues.	0.20	79.00
10/15/14	jemurphy 0015	Edits to Stipulation of Settlement based on revised settlement terms; review Attorney Rafferty's further edits to IRS POA form.	0.90	238.50
10/15/14	AJF 0015	Review IRS correspondence regarding authorization.	0.20	70.00
10/16/14	JHB 0015	Review Rafferty issues and steps to address.	0.20	79.00
10/16/14	jemurphy 0015	Communications with Attorney Rafferty regarding changes to the Stipulation of Settlement.	0.10	26.50
10/16/14	AJF 0015	Review of Power of Attorney (IRS 4868) as it relates to withholding taxes.	0.20	70.00
10/17/14	JHB 0015	Multiple emails from Attorney Rafferty regarding settlement revisions, support.	0.30	118.50
10/17/14	jemurphy 0015	Communications with Attorney Rafferty regarding qualifying language regarding financial representations of the Keilmans.	0.10	26.50
10/18/14	JHB 0015	Continued Rafferty emails regarding settlement issues and support, review approval implications.	0.20	79.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee

14190 Direct Air (Southern Sky Air & Tours, LLC)

10/21/14	JHB	0015	Continued attention to revisions, related tax and release issues, support for approval.	0.30	118.50
10/21/14	kmdellec	0015	Assist with efilng procedures/logistics in preparation of filing settlement pleadings.	0.50	97.50
10/21/14	kmdellec	0015	Update litigation control chart.	0.10	19.50
10/21/14	jemurphy	0015	Edits to Stipulation of Settlement; communications with counsel regarding completing settlement documents.	0.20	53.00
10/22/14	JHB	0015	Review, revise settlement motion, review underlying release, approval issues, emails with Attorney Murphy.	0.80	316.00
10/22/14	kmdellec	0015	Draft motion to limit notice and certificate of service; review and revise same; determine service list and review Local Rules as to declaration regarding electronic filing.	1.00	195.00
10/22/14	jemurphy	0015	Complete Stipulation of Settlement with the Keilmans and attend to filing Motion to Approve the same.	0.40	106.00
10/23/14	JHB	0015	Review open issues regarding settlement, review final form of agreement, approval pleadings.	0.30	118.50
10/23/14	kmdellec	0015	Assist and follow up with efilng/service of settlement pleadings.	0.50	97.50
10/23/14	jemurphy	0015	Attend to preparation of Motion to Limit Service and filing all settlement documents for approval.	0.10	26.50
10/23/14	goneil	0015	Attention to preparation of settlement approval documents, including memoranda regarding same (.2); assist with service issues (.1).	0.30	79.50
10/23/14	goneil	0015	Review and execute Stipulation, including to assist with preparation of exhibits (.4); review, revise, and compile Motion to Approve Stipulation, proposed Order, Motion to Limit Notice, and Certificate of Service and attend to filing same (.9).	1.30	344.50
10/24/14	kmdellec	0015	Track order allowing motion to limit notice.	0.10	19.50
10/24/14	kmdellec	0015	Update preference chart as to current status/deadlines.	0.10	19.50
10/30/14	goneil	0015	Review memorandum from Atty. Rafferty regarding settlement hearing, and consider Bankruptcy Court procedures related to same.	0.10	26.50
TYPE	0015	TOTAL		160.80	48,526.00

TASK: 0016 Adversary Proceeding

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

Attorney Summary	Hours	Value	Rate
139 JHB Joseph H. Baldiga	1.10	429.00	390.00
290 goneil Gina B. O'Neil	15.80	4,005.00	253.48
281 jemurphy Jessica E. Mur	0.40	102.00	255.00
274 kmdellec Kimberly M. De	4.60	851.00	185.00
TYPE 0016 TOTAL	21.90	5,387.00	

Time Detail			Hours	Value
10/01/12 goneil	0016	Emails with Attorney Greenberg (Ober Kaler) regarding status of response (.1).	0.10	24.50
10/05/12 goneil	0016	Confirm receipt of Ober Kaler response and update chart to reflect.	0.10	24.50
10/08/12 goneil	0016	Review and assess Ober Kaler response including OCB and new value defenses, review and assess relevant invoices, re-calculate new value using 2 different methods to reflect invoice and service dates, develop recommendations for Trustee, and prepare memorandum to Trustee regarding same (1.8).	1.80	441.00
12/11/12 goneil	0016	Emails with Attorney Greenberg regarding status of Ober Kaler response and update chart regarding same (.3).	0.30	73.50
01/02/13 goneil	0016	Review email from Attorney Greenberg (Ober Kaler) regarding status of preference response (.1).	0.10	24.50
08/15/13 goneil	0016	Confirm no issue with separate document subpoena to Ober Kaler, then email Attorney Greenberg to follow up on Ober Kaler response (.4).	0.40	102.00
08/20/13 goneil	0016	Review status of Ober Kaler preference demand and discuss same with Trustee (.2); email Attorney Raffery with preference information (.1); emails with Attorney Greenberg and Trustee regarding status of Ober Kaler's response (.2).	0.50	127.50
08/22/13 JHB	0016	Emails with Attorney Greenberg regarding Ober preference matters.	0.10	39.00
08/22/13 goneil	0016	Review emails between Trustee and Attorney Greenberg regarding Ober Kaler preference	0.10	25.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

Date	Initials	Time	Description	Rate	Amount
08/26/13	JHB	0016	response. Further preference review (.2), related emails with Attorney Raftery regarding Ober defenses (.2).	0.40	156.00
08/26/13	goneil	0016	Review preliminary response from Attorney Rafferty regarding Ober Kaler settlement offer (.1).	0.10	25.50
09/11/13	goneil	0016	Emails with Ober Kaler counsel to follow-up on response (.1).	0.10	25.50
09/11/13	goneil	0016	Review and track email from counsel to Ober Kaler attaching backup for response (.1).	0.10	25.50
09/12/13	goneil	0016	Review and assess new backup provided by Ober Kaler, including to correlate new bill history with previously-provided invoices (.6) and discuss value of same with Trustee (.1).	0.70	178.50
09/16/13	goneil	0016	Draft response to Ober Kaler regarding ordinary course defense (.5) and update chart to reflect (.1).	0.60	153.00
09/23/13	JHB	0016	(Ober) Review response, proposal and assess and respond to same with final counteroffer, and review related materials.	0.40	156.00
09/23/13	goneil	0016	Review, assess and track preference counteroffer portion of email from Ober Kaler (.2), assist with Trustee's assessment of same (.1) and review Trustee's email in response and update chart to reflect new deadline (.1).	0.40	102.00
09/25/13	goneil	0016	Review and track response from Attorney Greenberg (Ober Kaler) with renewed proposal.	0.10	25.50
10/01/13	goneil	0016	Review and analyze new defenses from Ober Kaler, including invoices and 2-matter payment history (1.4).	1.40	357.00
10/02/13	goneil	0016	Develop potential counteroffer for Ober Kaler and draft memorandum to Trustee providing analysis of same (.9), consider Trustee's response (.1).	1.00	255.00
10/03/13	jemurphy	0016	Communications with Attorney Rafferty and edits to proposed Stipulation regarding Ober Kaler's production of documents.	0.40	102.00
10/16/13	goneil	0016	Develop Ober Kaler counteroffer and draft response and counteroffer, including summary of analysis.	1.00	255.00
10/17/13	goneil	0016	Implement Trustee's suggested edits into Ober Kaler email and send same to Attorney Greenberg (.2); update chart regarding same (.1).	0.30	76.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

12/06/13 kmdellec 0016	Draft complaint and cover sheet and review/revise; on-line search of Maryland Secretary of State web-site as to current corporate information of defendant; attend to conflict check.	1.20	222.00
12/06/13 goneil 0016	Prepare file for Complaint.	0.10	25.50
12/10/13 kmdellec 0016	Receipt and review of back-up information from accountant; revise complaint and exhibits.	0.60	111.00
12/26/13 goneil 0016	Review draft Complaint v. Ober Kaler, including review of prior analysis and review of corresponding exhibits (.4); finalize draft Complaint to send to defendant (.1).	0.50	127.50
12/27/13 goneil 0016	Review next steps to address draft Complaints and corresponding negotiations.	0.10	25.50
02/25/14 goneil 0016	Finalize Complaint and email same to Atty. Greenberg with renewed settlement offer.	0.40	102.00
02/26/14 kmdellec 0016	Track settlement by trustee.	0.10	18.50
02/27/14 goneil 0016	Review emails between Trustee and Atty. Greenberg (Ober Kaler) regarding settlement of preference matter.	0.10	25.50
03/04/14 kmdellec 0016	Review file information/demand; draft stipulation of settlement and tolling agreement; review and revise all.	0.80	148.00
03/04/14 goneil 0016	Emails with Atty. Greenberg (Ober Kaler)) regarding Stipulation and funds (.1).	0.10	25.50
03/05/14 kmdellec 0016	Draft approval motion, motion to limit and certificate of service for all; review/confirm service list.	0.90	166.50
03/05/14 goneil 0016	Confirm receipt of settlement check and follow up regarding settlement.	0.10	25.50
03/06/14 goneil 0016	Review status of Ober Kaler Stipulation (.1); consider exclusions to Motion to Limit Notice (.1).	0.20	51.00
03/07/14 goneil 0016	Review and revise Stipulation approval package for Ober Kaler, including Settlement Agreement, approval motion, Tolling Agreement, Motion to Limit Notice and Certificate of Service (.6) and email Stipulation and Tolling Agreement to Atty. Greenberg (.2).	0.80	204.00
03/10/14 kmdellec 0016	Review electronic mails from J. Greenberg to trustee's counsel regarding proposed settlement agreement and format of same.	0.10	18.50
03/11/14 kmdellec 0016	Track signed Tolling Agreement.	0.10	18.50
03/11/14 goneil 0016	Review local Bankruptcy Rules in response to	1.30	331.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

Ober Kaler's request for a differently-formatted Settlement Agreement (.2) and draft response to Ober Kaler regarding same (.1); consider Ober Kaler's request to modify releases in Settlement Agreement and draft memoranda to Trustee regarding same (.3); email Atty. Greenberg regarding Stipulation, releases and Tolling Agreement (.2); review email from Atty. Greenberg regarding Stipulation, releases, second Tolling Agreement (.1); revise Stipulation and associated settlement documents consistent with Ober Kaler's request to change title and releases (.4).

03/12/14	goneil	0016	Review and edit Settlement package (.2); finalize settlement package, confer with Trustee about appearance issues, and email Atty. Greenberg regarding same (.4).	0.60	153.00
03/25/14	goneil	0016	Email Atty. Greenberg to follow up regarding outstanding Settlement Agreement.	0.10	25.50
03/26/14	kmdellec	0016	Track response from J. Greenberg as to proposed agreement; calendar ahead.	0.10	18.50
03/26/14	kmdellec	0016	Track follow-up with opposing counsel as to status of settlement agreement.	0.10	18.50
03/26/14	goneil	0016	Review email from Atty. Greenberg regarding settlement status (.1); review and assess Ober Kaler's proposed edits to Stipulation and memorandum to Trustee regarding same (.2).	0.30	76.50
03/27/14	JHB	0016	Review and revise revisions to settlement agreement.	0.20	78.00
03/28/14	goneil	0016	Follow up regarding Ober Kaler Stipulation and revisions (.1); implement edits into updated Settlement Agreement (.2).	0.30	76.50
03/30/14	goneil	0016	Email Atty. Greenberg with revised Settlement Agreement (.2); revise approval package to be consistent with edits to Settlement Agreement (.2); update chart regarding same (.1).	0.50	127.50
03/31/14	goneil	0016	Review revised settlement package and further edit same.	0.20	51.00
04/01/14	goneil	0016	Review email from Atty. Greenberg regarding settlement status.	0.10	25.50
04/13/14	goneil	0016	Prepare Stipulation approval package for filing.	0.30	76.50
04/14/14	kmdellec	0016	Track receipt of executed settlement agreement.	0.10	18.50
04/14/14	goneil	0016	Review next steps to finalize settlement and	0.20	51.00

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14190 Direct Air (Southern Sky Air & Tours, LLC)

		obtain approval (.1); execute approval package for e-filing and email full Stipulation to Atty. Greenberg (.1).		
04/15/14	kmdellec 0016	Assist with e-filing and service of settlement pleadings.	0.20	37.00
04/15/14	goneil 0016	Attention to filing of Stipulation pleadings.	0.10	25.50
05/13/14	kmdellec 0016	(Ober Kaler) Track order allowing settlement; forward copy of order to Attorney Greenberg via email; confirm all issues resolved and update control chart accordingly.	0.30	55.50
05/13/14	goneil 0016	Review Court's Order approving settlement.	0.10	25.50
05/14/14	goneil 0016	Attention to matter wrap-up.	0.10	25.50
	TYPE 0016	TOTAL	21.90	5,387.00

TASK: 0017 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
290 goneil Gina B. O'Neil	4.70	1,196.50	254.57
274 kmdellec Kimberly M. De	5.20	962.00	185.00
TYPE 0017 TOTAL	9.90	2,158.50	

Time Detail	Hours	Value
11/02/12 goneil 0017	0.20	49.00
08/30/13 goneil 0017	0.60	153.00
09/05/13 goneil 0017	0.10	25.50
09/16/13 goneil 0017	0.10	25.50
10/21/13 goneil 0017	0.10	25.50
12/06/13 kmdellec 0017	1.30	240.50
12/06/13 goneil 0017	0.10	25.50

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14190 Direct Air (Southern Sky Air & Tours, LLC)

12/10/13 kmdellec 0017	Receipt and review of back-up information from accountant; revise complaint and exhibits.	0.60	111.00
12/26/13 goneil 0017	Review and revise Complaint, including to add proof of claim information.	0.40	102.00
12/27/13 goneil 0017	Review next steps to address draft Complaints and corresponding negotiations.	0.10	25.50
01/08/14 goneil 0017	Email draft Complaint to Attorney Holmes, update chart, and track new response deadline.	0.30	76.50
01/09/14 goneil 0017	Review email offer from Attorney Holmes.	0.10	25.50
01/17/14 kmdellec 0017	Review file information; draft stipulation, motion to approve, motion to limit and certificate of service for all; review/revise all and confirm service list (x2).	2.00	370.00
01/17/14 goneil 0017	Review and assess settlement offer (.1); confer with Trustee regarding same (.1).	0.20	51.00
01/20/14 goneil 0017	Email Attorney Holmes regarding acceptance of settlement offer (.1); attend to preparation of Stipulation and approval documents (.1).	0.20	51.00
01/27/14 goneil 0017	Attention to preparation of settlement pleadings (.1); review and revise Stipulation (.1); review and revise Motion to Approve (.1); review and revise Motion to Limit Notice, Certificate of Service and service list (.1).	0.40	102.00
01/30/14 kmdellec 0017	Track transmittal of draft settlement agreement to Attorney Holmes; calendar ahead for receipt.	0.10	18.50
01/30/14 goneil 0017	Further update and finalize settlement package for defendant's review (.4); email Attorney Holmes with Wyvern Settlement Stipulation (.1); update chart to reflect (.1).	0.60	153.00
02/05/14 goneil 0017	Update chart regarding Wyvern Hotel settlement.	0.10	25.50
02/24/14 kmdellec 0017	Review emails, track settlement and calendar ahead.	0.20	37.00
02/24/14 goneil 0017	Email Atty. Holmes to follow up on Stipulation status.	0.10	25.50
02/28/14 goneil 0017	Review email from Atty. Holmes regarding status of Settlement Agreement and funds.	0.10	25.50
03/09/14 goneil 0017	Attention to preparation of Tolling Agreement based on status of Stipulation.	0.10	25.50
03/10/14 kmdellec 0017	Prepare tolling agreement and forward to Attorney Holmes via electronic mail.	0.30	55.50
03/10/14 goneil 0017	Follow up regarding Tolling Agreement in context of pending settlement (.1); review emails regarding same (.1).	0.20	51.00
03/10/14 goneil 0017	Review memoranda regarding Tolling Agreement	0.10	25.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

and consider logistics associated with tracking same.

03/11/14 kmdellec 0017	Track signed Tolling Agreement.	0.10	18.50
03/12/14 kmdellec 0017	Finalize settlement pleadings for e-filing/service; update control sheet.	0.30	55.50
03/12/14 goneil 0017	Confirm receipt of settlement check, package Stipulation pleadings for filing, and update chart to reflect.	0.30	76.50
03/18/14 kmdellec 0017	Track/confirm order regarding motion to limit notice.	0.10	18.50
04/11/14 kmdellec 0017	Forward copy of approval order to Attorney Holmes via electronic mail; update control sheet accordingly.	0.20	37.00
04/11/14 goneil 0017	Follow up regarding settlement approval.	0.10	25.50
04/14/14 goneil 0017	Follow up regarding finalizing settlement and matter.	0.10	25.50
TYPE 0017	TOTAL	9.90	2,158.50

TASK: 0018 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
139 JHB Joseph H. Baldiga	0.40	156.00	390.00
290 goneil Gina B. O'Neil	4.80	1,224.00	255.00
274 kmdellec Kimberly M. De	4.80	888.00	185.00
TYPE 0018 TOTAL	10.00	2,268.00	

Time Detail	Hours	Value
12/06/13 kmdellec 0018	1.50	277.50
12/06/13 goneil 0018	0.10	25.50
12/10/13 kmdellec 0018	0.60	111.00
12/27/13 goneil 0018	0.10	25.50
12/27/13 goneil 0018	0.80	204.00

Draft complaint and cover sheet; on-line search of New York Department of State as to current corporate information; attend to conflict check; review/revise complaint.
Prepare file for Complaint.
Receipt and review of back-up information from accountant; revise complaint and exhibits.
Review next steps to address draft Complaints and corresponding negotiations.
Review and revise Complaint, including to review exhibits and to reflect proof of claim information (.5); draft letter to Attorney

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

12/30/13	goneil	0018	Finucane enclosing draft Complaint and discussing potential settlement terms (.3). Review and revise draft Complaint and cover letter to Attorney Finucane.	0.10	25.50
12/31/13	goneil	0018	Finalize letter to Attorney Finucane regarding draft Complaint (.1); edit and update chart regarding same (.1).	0.20	51.00
01/09/14	JHB	0018	Review open settlement issues, terms and related discovery strategies.	0.20	78.00
01/09/14	goneil	0018	Review materials in preparation for call with Attorney Finucane (.1); telephone calls with Attorney Finucane regarding claim allowance and possible settlement (.3); review Proof of Claim filed by the Port Authority and develop potential settlement terms to include claim allowance (.3); email M. Finucane regarding terms of settlement (.4).	1.10	280.50
01/10/14	goneil	0018	Emails with Attorney Finucane regarding settlement terms.	0.10	25.50
01/13/14	JHB	0018	Review negotiations regarding possible settlement, complaint extension.	0.20	78.00
01/13/14	goneil	0018	Emails with Attorney Finucane regarding settlement status and extension of deadline (.2); update chart regarding same (.1).	0.30	76.50
01/21/14	kmdellec	0018	Draft stipulation, motion to approve, motion to limit and certificate of service; review and revise (x2); update service list.	2.10	388.50
01/21/14	goneil	0018	Emails with Attorney Finucane regarding settlement agreement (.1); compile materials necessary for settlement and attend to preparation of same (.2).	0.30	76.50
01/27/14	kmdellec	0018	Update control sheet as to draft settlement agreement and forward to opposing counsel for review /signature; calendar ahead.	0.10	18.50
01/27/14	goneil	0018	Review and further revise complete settlement package and cover letter (.2); finalize settlement package and send to Attorney Finucane for review (.2); additional correspondence regarding same (.1).	0.50	127.50
01/28/14	goneil	0018	Emails with Attorney Finucane regarding Settlement Agreement.	0.10	25.50
02/03/14	goneil	0018	Confirm receipt of signed settlement agreement, execute same, and attend to logistics of finalizing settlement and triggering payment.	0.20	51.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

02/04/14 kmdellec	0018	Finalize settlement pleadings for efilng and service.	0.20	37.00
02/04/14 goneil	0018	Revise and finalize cover letter to Atty. Finucane (.1); finalize settlement package for filing (.2); update chart to reflect settlement (.1).	0.40	102.00
02/06/14 kmdellec	0018	Track order allowing motion to limit notice.	0.10	18.50
02/07/14 goneil	0018	Emails with Atty. Finucane regarding tax ID.	0.10	25.50
02/23/14 goneil	0018	Review status of Stipulation and payment and email Atty. Finucane regarding status of payment; update chart regarding same.	0.20	51.00
02/24/14 goneil	0018	Review email from Atty. Finucane regarding payment status.	0.10	25.50
02/26/14 kmdellec	0018	Attention to receipt/deposit of settlement funds.	0.10	18.50
02/26/14 goneil	0018	Review memoranda confirming receipt of settlement check.	0.10	25.50
03/03/14 kmdellec	0018	Track order allowing stipulation of settlement and update control sheet accordingly.	0.10	18.50
TYPE	0018	TOTAL	10.00	2,268.00

TASK: 0019 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
139 JHB Joseph H. Baldiga	8.50	3,315.00	390.00
290 goneil Gina B. O'Neil	2.10	535.50	255.00
281 jemurphy Jessica E. Mur	23.10	5,890.50	255.00
162 RBG Robert B. Gibbons	0.20	75.00	375.00
274 kmdellec Kimberly M. De	4.80	888.00	185.00
TYPE 0019 TOTAL	38.70	10,704.00	

Time Detail	Hours	Value
01/15/14 JHB 0019 First review of Merrick complaint, devise response strategies, and related emails with Attorneys Reier, Otenti.	0.40	156.00
01/15/14 RBG 0019 Strategy planning regarding pleadings filed by Merrick.	0.20	75.00
01/15/14 jemurphy 0019 Review complaint for Merrick's Declaratory Judgment action against the Trustee; strategy	2.00	510.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

regarding initial response to complaint and strategy in the litigation; begin legal research on Merrick's class action and who owns them.

01/15/14	goneil	0019	Review Merrick's Complaint for Declaratory Judgment.	0.30	76.50
01/29/14	JHB	0019	Revise answer to MB complaint and review underlying complaint, claim materials.	1.10	429.00
01/29/14	jemurphy	0019	Draft counterclaim and revise Answer to Merrick Bank's Complaint; analyze affirmative defenses.	1.20	306.00
01/29/14	goneil	0019	Assist with Answer and counterclaims regarding Merrick's Complaint.	0.10	25.50
01/30/14	JHB	0019	Further attention to answer (Merrick complaint).	0.20	78.00
01/30/14	jemurphy	0019	Revise Answer and Counterclaim.	0.20	51.00
01/31/14	kmdellec	0019	Telephone call to case administrator (x1) and S. Smith (x2) to add trustee to ECF recipient list.	0.30	55.50
02/03/14	kmdellec	0019	Prepare notice of appearance for J. Baldiga; add adversary proceeding to cases for G. O'Neil to monitor.	0.30	55.50
02/03/14	jemurphy	0019	Strategy regarding setting a Rule 16(b) conference with the Court and Merrick.	0.20	51.00
02/03/14	goneil	0019	Review memoranda regarding Merrick Complaint and Trustee's Answer.	0.10	25.50
02/21/14	jemurphy	0019	Review Merrick's answer to the Trustee's counterclaims alleging breach of the automatic stay.	0.30	76.50
02/24/14	JHB	0019	Review MB answer, pretrial order and issues (.3); review issues and strategies regarding report, 2/25 DOT meeting (.2).	0.50	195.00
02/25/14	JHB	0019	Review MB motion for judgment, related memo; research and analysis regarding response strategies and confer with litigation team.	1.10	429.00
02/25/14	goneil	0019	Review pleadings regarding Merrick claims and memoranda regarding potential response.	0.20	51.00
02/26/14	kmdellec	0019	Receipt of hearing notice on Merrick's motion for judgment and track same.	0.10	18.50
02/26/14	goneil	0019	Review memoranda with Trustee regarding response to Merrick's standing issues.	0.10	25.50
03/04/14	JHB	0019	Call from Attorney Gurfein regarding discovery issues, litigation analysis (.4), related emails regarding possible resolution (.2).	0.60	234.00
03/04/14	jemurphy	0019	Strategy with the Trustee regarding possible	0.20	51.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		mediation of the dispute with Merrick; discuss merits of the parties' positions.		
03/05/14	jemurphy 0019	Communications with Attorney Gurfein regarding 26(f) conference.	0.20	51.00
03/06/14	jemurphy 0019	Initial review of Merrick's Motion for Judgment on the Pleadings.	0.70	178.50
03/07/14	jemurphy 0019	Review Merrick Complaint and analyse discovery necessary; prepare for Rule 26(f) conference.	0.70	178.50
03/07/14	jemurphy 0019	Initial call with Attorney Gurfein regarding Rule 26(f) issues; further preparation for Rule 26(f) conference.	0.30	76.50
03/07/14	jemurphy 0019	Conduct Rule 26(f) conference with Attorney Gurfein.	0.80	204.00
03/07/14	jemurphy 0019	Strategy regarding next steps in the litigation.	0.30	76.50
03/07/14	goneil 0019	Strategize regarding negotiations with Merrick.	0.20	51.00
03/09/14	jemurphy 0019	Review and analyze Merrick Bank's arguments in its Motion for Judgment on the Pleadings.	1.70	433.50
03/10/14	JHB 0019	Settlement call with Attorney Gurfein and reach settlement (.3), review related drafting, litigation issues (.2); lengthy call from Attorney Sternklar regarding same (.4).	0.90	351.00
03/10/14	jemurphy 0019	Analyze Merrick's settlement counter offer.	0.10	25.50
03/10/14	jemurphy 0019	Conference call with Attorney Gurfein and Attorney Regan regarding settlement; plan Motion to Approve Settlement.	0.40	102.00
03/11/14	JHB 0019	Review and revise settlement agreement and release from Attorney Gurfein (.2), emails with same regarding approval, litigation issues (.2).	0.40	156.00
03/11/14	jemurphy 0019	Review Assignment and Settlement Agreement prepared by Merrick; begin to prepare Motion to Approve Settlement.	0.60	153.00
03/11/14	goneil 0019	Review memoranda and background regarding settlement and approval of same.	0.20	51.00
03/11/14	goneil 0019	Review Settlement Agreement.	0.10	25.50
03/12/14	jemurphy 0019	Edit and continue drafting Motion to Approve Assignment and Settlement Agreement.	0.50	127.50
03/14/14	JHB 0019	Emails with Attorney Gurfein regarding open settlement issues.	0.20	78.00
03/17/14	jemurphy 0019	Further draft Motion to Approve Assignment and Settlement regarding VNB claims.	1.80	459.00
03/18/14	JHB 0019	Revise settlement agreement and related approval motion and related emails with	0.90	351.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

Attorneys Gurfein, Regan.

03/18/14 jemurphy 0019	Edits to Motion to Approve Settlement.	3.00	765.00
03/19/14 kmdellec 0019	Review settlement agreement/approval motion and attend to exhibits for same; prepare motion to limit notice and certificate of service; review and revised same (x2); review service list; coordinate efilng/service and calendar ahead for receipt of order.	1.30	240.50
03/19/14 jemurphy 0019	Final edits to Motion to Approve settlement.	0.10	25.50
03/20/14 kmdellec 0019	Track order allowing motion to limit notice regarding Merrick Bank settlement.	0.10	18.50
03/24/14 jemurphy 0019	Attend to preparation of Motion to Continue case deadlines while Motion to Approve Settlement is pending.	0.10	25.50
03/25/14 kmdellec 0019	Draft assented-to motion to continue certain deadlines and review/revise same.	1.60	296.00
03/25/14 jemurphy 0019	Edits to Motion to Continue Deadlines; communications with Attorney Regan and Attorney Gurfein regarding Merrick's assets to the same.	1.20	306.00
03/26/14 jemurphy 0019	Final edits to Motion to Extend Deadlines; attend to filing/service.	0.30	76.50
03/26/14 jemurphy 0019	Review status of case and next steps after Court's order on Motion to Continue Deadlines and pending Motion to Approve Settlement.	0.20	51.00
03/26/14 jemurphy 0019	Communications with Atotrney Gurfein regarding Merrick's service of VNB complaint.	0.10	25.50
03/26/14 goneil 0019	Review new pleadings and settlement regarding Merrick claims.	0.20	51.00
03/31/14 JHB 0019	Call from Attorney Sternklar regarding settlement, possible revisions to proposed order, review same.	0.30	117.00
04/01/14 JHB 0019	Review revisions to proposed order from Attorney Sternklar, related emails with Attorneys Gurfein, Sternklar.	0.30	117.00
04/02/14 JHB 0019	Emails with Attorney Sternklar, Court regarding revised order, and review form of order.	0.20	78.00
04/02/14 jemurphy 0019	Review VNB's proposed order regarding the Trustee and Merrick's settlement regarding VNB claims; phone call with Attorney Sternklar regarding filing the same.	0.30	76.50
04/02/14 jemurphy 0019	Review Attorney Sternklar's correspondence with the Court regarding a proposed modification to the Trustee & Merrick's settlement of VNB claims.	0.20	51.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee

14190 Direct Air (Southern Sky Air & Tours, LLC)

04/02/14 goneil	0019	Strategize regarding preparation and filing of Notice of Revised Proposed Order; assist with logistics of providing Bankruptcy Court with same.	0.20	51.00
04/03/14 jemurphy	0019	Review Attorney McGee's proposal that the Trustee & Merrick's settlement address offsetting Merrick's claim in Direct Air's bankruptcy by virtue of any recovery by Merrick in the Merrick v. VNB suit.	0.20	51.00
04/04/14 JHB	0019	Review and respond to McGee question assignment agreement with MB.	0.20	78.00
04/04/14 jemurphy	0019	Analyze suggestion for an agreement with Merrick to offset recovery by Merrick in the Direct Air bankruptcy based on any recovery in the Merrick v. VNB action.	0.20	51.00
04/04/14 jemurphy	0019	Review and analyze Merrick's amended complaint, including Trustee's assigned claims.	0.30	76.50
04/08/14 JHB	0019	Review, comment on amended complaint.	0.20	78.00
04/09/14 jemurphy	0019	Review status of Trustee's motion to approve settlement with Merrick Bank; communications with Attorney Gurfein regarding the same.	0.10	25.50
04/10/14 JHB	0019	Emails with Attorney McGee regarding MB issues.	0.10	39.00
04/11/14 kmdellec	0019	Telephone call to and from Madelyn at Bankruptcy Court regarding status of order regarding settlement motion; calendar regarding follow-up.	0.20	37.00
04/14/14 jemurphy	0019	Review status of the pending Motion to Approve Settlement; update Attorney Gurfein.	0.10	25.50
04/14/14 jemurphy	0019	Strategy regarding DOT's request for Direct Air documents.	0.10	25.50
04/15/14 jemurphy	0019	Communications with Attorney Regan regarding Direct Air's airport credit card machines.	0.10	25.50
04/16/14 jemurphy	0019	Communications with Attorney Gurfein and Attorney Aieta regarding Merrick's claims against VNB and issues of timing between the Merrick v. Trustee case and Merrick v. VNB case.	0.20	51.00
04/25/14 kmdellec	0019	Prepare certificate of service regarding notice of hearing regarding motion to approve settlement with Merrick Bank; confirm service of same.	0.30	55.50
04/25/14 jemurphy	0019	Review Court's Notice of Hearing on Motion to Approve Settlement; notice hearing; review VNB's position on the proposed settlement and	0.40	102.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		initial strategy regarding argument for hearing.		
04/25/14	goneil 0019	Assist with service regarding hearing on Merrick settlement motion.	0.10	25.50
04/28/14	JHB 0019	Review MB pleadings in action v. VNB, upcoming benchmarks.	0.30	117.00
05/05/14	JHB 0019	Strategies, open issues for 5/8 hearing on VNB claim assignment to MB.	0.30	117.00
05/05/14	jemurphy 0019	Review DOT's Motion to Appear Telephonically at Trustee/Merrick settlement hearing; phone call with A. Handel regarding DOT's position on Trustee/Merrick settlement.	0.30	76.50
05/05/14	jemurphy 0019	Phone call with consumer regarding question on hearing on Trustee/Merrick settlement.	0.10	25.50
05/05/14	jemurphy 0019	Initial strategy regarding preparing for hearing on Trustee's Motion to Approve Trustee/Merrick's settlement; phone call with Attorney Gurfein regarding Merrick's litigation plan for Merrick / VNB action; review Amex's prior limited objection to the settlement.	0.80	204.00
05/05/14	goneil 0019	Assist with development of arguments for Merrick Settlement Agreement hearing.	0.20	51.00
05/08/14	jemurphy 0019	Final preparation of argument for hearing on motion to approve settlement between Merrick and the Trustee; attend hearing on Motion to Approve Settlement in Worcester Bankruptcy Court; review Court's order approving settlement.	2.40	612.00
05/08/14	goneil 0019	Follow up regarding hearing on Merrick settlement.	0.10	25.50
05/09/14	kmdellec 0019	Draft stipulation of dismissal and certificate of service; review all and confirm service list on pacer docket.	0.50	92.50
05/14/14	JHB 0019	Review and revise dismissal and review open assignment, litigation issues.	0.30	117.00
05/14/14	jemurphy 0019	Review/edit Stipulation of Dismissal.	0.10	25.50
05/30/14	kmdellec 0019	Review pacer docket and update litigation control sheet accordingly.	0.10	18.50
	TYPE 0019	TOTAL	38.70	10,704.00

TASK: 0020 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
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15008 Joseph H. Baldiga, Chapter 7 Trustee
 14190 Direct Air (Southern Sky Air & Tours, LLC)

139 JHB Joseph H. Baldiga	0.90	351.00	390.00
290 goneil Gina B. O'Neil	14.80	3,774.00	255.00
274 kmdellec Kimberly M. De	7.90	1,464.50	185.38
TYPE 0020 TOTAL	23.60	5,589.50	

Time Detail

		Hours	Value
02/03/14 kmdellec 0020	Review conflict search results, electronic mail to accountant to request back up documents.	0.20	37.00
02/20/14 kmdellec 0020	Review demand and supporting documents; review claims register to determine if claim filed by defendant; draft adversary complaint and cover sheet; review and revise same.	1.40	259.00
02/25/14 goneil 0020	Review preference response from Aviation Advantage (.1).	0.10	25.50
02/25/14 goneil 0020	Review and evaluate Atty. Kushner (Aviation Advantage) response, review Trustee's response, and update chart to reflect (.3).	0.30	76.50
03/13/14 goneil 0020	Review background materials and research subsequent transferee liability to determine action v. "ASIG" (.6); memoranda with Trustee regarding same (.3); review and revise Complaint (.8).	1.70	433.50
03/14/14 kmdellec 0020	Letter to defendant enclosing complaint/summons; attention to revisions and service of same.	0.50	92.50
03/14/14 kmdellec 0020	Track answer deadline; attention to efilings of certificate of service.	0.20	37.00
03/14/14 goneil 0020	Review and edit Complaint (.2); attention to filing same (.1).	0.30	76.50
03/14/14 goneil 0020	Review, revise, and execute Certificate of Service package regarding Complaint and Summons.	0.10	25.50
03/18/14 goneil 0020	Review emails from Atty. Kushner regarding Complaint (.1) and follow up with Trustee regarding same (.1).	0.20	51.00
03/19/14 goneil 0020	Consider response to Atty. Kushner.	0.10	25.50
03/20/14 goneil 0020	Consider additional amendments to Complaint.	0.10	25.50
03/24/14 JHB 0020	Strategies regarding complaint amendments, possible settlement; review related transfer, defense materials.	0.30	117.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee

14190 Direct Air (Southern Sky Air & Tours, LLC)

03/24/14	goneil	0020	Review all backup materials and consider whether to withdraw any portion of Complaint per defendant's request, and research aircraft charter status and escrow requirements in connection with same.	1.20	306.00
03/24/14	goneil	0020	Strategize regarding amendment to Complaint (.1); confer with Trustee regarding same (.1).	0.20	51.00
03/24/14	goneil	0020	Review backup materials and invoices in order to assess new value defense and develop potential settlement offer based on same (.8); commence email to Atty. Kushner regarding amending Complaint and potential resolution of Grand Services Transfers (.4); research ordinary course of business case law in order to develop and augment same (.5).	1.70	433.50
03/25/14	JHB	0020	Review and revise settlement proposal, assess defenses.	0.30	117.00
03/25/14	goneil	0020	Continue drafting email to Atty. Kushner outlining ordinary course of business information and proposing settlement, and review ordinary course information in connection with same (.9); email Trustee regarding proposal and possible defenses (.1); finalize email and send to Atty. Kushner (.1).	1.10	280.50
03/25/14	goneil	0020	Strategize regarding contents and format of amended Complaint.	0.20	51.00
03/25/14	goneil	0020	Prepare Amended Complaint (.3); finalize Amended Complaint, with corresponding exhibits, and execute same for filing (.3).	0.60	153.00
03/26/14	kmdellec	0020	Revise adversary proceeding cover sheet and prepare certificate of service and transmittal letter; finalize all for e-filing and service.	0.50	92.50
03/26/14	goneil	0020	Attention to revision of AP cover sheet based on clerk's advice.	0.10	25.50
03/26/14	goneil	0020	Review and execute AP Cover Sheet for Amended Complaint.	0.10	25.50
03/27/14	JHB	0020	Review counterproposal, devise response strategies and review underlying defense materials.	0.30	117.00
03/27/14	goneil	0020	Review and evaluate email from Atty. Kushner regarding settlement proposal (.2); attention to filing of Amended Complaint (.1); review and execute Certificate of Service (.1); memoranda with Trustee about analysis of counteroffer	0.50	127.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		(.1).		
03/28/14	goneil 0020	Confer with Trustee regarding next steps.	0.10	25.50
03/30/14	goneil 0020	Prepare updated New Value Analysis chart, in order to evaluate offer (.4); evaluate settlement offer, prepare email to Trustee with new value analysis, recommendations, and proposed response to Atty. Kushner (.8).	1.20	306.00
03/31/14	goneil 0020	Edit and send Memorandum to Trustee regarding counteroffer (.1); revise and send counteroffer to Atty. Kusher (.1) and update chart to reflect (.1).	0.30	76.50
04/01/14	goneil 0020	Review and consider email from Atty. Kushner with updated settlement offer (.1); confer with Trustee regarding settlement (.1); prepare materials for settlement pleadings (.3); email Atty. Kushner with summary of settlement terms (.2).	0.70	178.50
04/02/14	kmdellec 0020	Track additional language for inclusion in settlement agreement.	0.10	18.50
04/02/14	kmdellec 0020	Track return of service.	0.10	18.50
04/02/14	goneil 0020	Review proposed "no admission of liability" language from Atty. Kushner.	0.10	25.50
04/10/14	goneil 0020	Emails with Atty. Kushner regarding settlement.	0.10	25.50
04/11/14	kmdellec 0020	Review emails between trustee and Attorney Kushner; prepare assented-to motion to extend answer deadline for filing prior to completion of settlement pleadings.	0.50	92.50
04/11/14	goneil 0020	Review emails with Atty. Kushner regarding Answer deadline and settlement.	0.10	25.50
04/11/14	goneil 0020	Review and revise Motion to Extend Answer deadline (.2); finalize, execute, and attend to filing same (.2).	0.40	102.00
04/14/14	kmdellec 0020	Review file information; draft stipulation of settlement, approval motion, motion to limit notice and certificate of service; review and revise all; review/revise service list.	2.50	462.50
04/22/14	goneil 0020	Review and revise Settlement Agreement (.5), Motion to Approve (.4), Motion to Limit Notice (.1), and Certificate of Service (.1); review package and finalize for counsel's review (.1).	1.20	306.00
04/23/14	kmdellec 0020	Review and forward draft stipulation to Attorney Kushner via electronic mail for review/signature.	0.30	55.50
04/28/14	kmdellec 0020	Track response to Attorney Kushner regarding	0.10	18.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		trustee's limited release.		
04/28/14	goneil 0020	Emails with Atty. Kushner regarding releases and settlement.	0.20	51.00
04/30/14	goneil 0020	Review email from Atty. Kushner and prepare Stipulation for filing.	0.20	51.00
05/01/14	goneil 0020	Prepare settlement approval package.	0.10	25.50
05/05/14	kmdellec 0020	Track efilng of settlement pleadings; update control chart; assist with service.	0.30	55.50
05/05/14	goneil 0020	Email Atty. Kushner with fully-executed Stipulation (.1); prepare approval package for filing and update chart (.1); emails with Atty. Kushner about payment timing (.1); review Court's docket entries regarding Stipulation (.1).	0.40	102.00
05/07/14	goneil 0020	Review multiple Sky King pleadings.	0.10	25.50
05/12/14	goneil 0020	Confirm receipt of funds and update chart to reflect.	0.10	25.50
05/27/14	goneil 0020	Follow up regarding status of settlement approval.	0.10	25.50
05/30/14	kmdellec 0020	Review pacer docket and update litigation control sheet accordingly.	0.10	18.50
06/02/14	goneil 0020	Review Court's Order approving Stipulation, including dismissal terms (.2); email Atty. Kushner (.1); update chart and attend to matter wrap-up (.1).	0.40	102.00
06/03/14	kmdellec 0020	Update control sheet regarding entry of approval order; prepare notice of voluntary dismissal and confirm service list; review and revise.	0.50	92.50
06/10/14	goneil 0020	Track dismissal deadline.	0.10	25.50
06/17/14	goneil 0020	Emails with Attorney Kushner regarding closing of Adversary Proceeding.	0.10	25.50
06/23/14	kmdellec 0020	Track closure of adversary proceeding by Bankruptcy Court and mail to Attorney Kushner regarding same.	0.10	18.50
06/23/14	goneil 0020	Follow up regarding dismissal of Adversary Proceeding (.1); follow up regarding settlement funds and anticipated timing for payment of same (.1).	0.20	51.00
06/30/14	kmdellec 0020	Review status of case/update litigation control sheet accordingly.	0.20	37.00
07/28/14	kmdellec 0020	Review status of case and update control chart accordingly.	0.10	19.50
07/28/14	kmdellec 0020	Review revisions to updated control chart.	0.10	19.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

08/01/14 kmdellec 0020	Review Form 2 and update litigation control chart as to settlement proceeds received/expected.	0.10	19.50
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TYPE	0020	TOTAL	23.60	5,589.50
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TASK: 0021 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
139 JHB Joseph H. Baldiga	3.50	1,365.00	390.00
290 goneil Gina B. O'Neil	0.90	229.50	255.00
255 cborourk Cori B. O'Rour	3.70	703.00	190.00
281 jemurphy Jessica E. Mur	15.20	3,876.00	255.00
274 kmdellec Kimberly M. De	4.30	798.50	185.70

TYPE 0021	TOTAL	27.60	6,972.00
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Time Detail	Hours	Value
03/03/14 goneil 0021 Strategize regarding format of Complaint and counts associated with same (.1); strategize regarding production of final numbers for Complaint (.1).	0.20	51.00
03/13/14 JHB 0021 Review final form of complaint, underlying transfer materials, execute verification.	0.40	156.00
03/13/14 kmdellec 0021 Prepare Declaration regarding electronic filing regarding Tull & Ellison verified complaint and assist with efilng same.	0.10	18.50
03/14/14 kmdellec 0021 Attention to notice of emergency hearing regarding preliminary injunction and notice of same.	0.20	37.00
03/18/14 kmdellec 0021 Attention to ECF notice for J. Baldiga and G. O'Neil.	0.10	18.50
03/20/14 jemurphy 0021 Review and attempt to address service issues of adversary proceeding complaints against J. Tull and the Ellisons with counsel.	0.20	51.00
03/21/14 jemurphy 0021 Attend to service of TROs on J. Tull and the Ellisons.	0.10	25.50
03/24/14 jemurphy 0021 Review returned service on J. Tull and the Ellisons; strategy regarding next steps to make service; attend to obtaining alternative address from USPS.	0.10	25.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee

14190 Direct Air (Southern Sky Air & Tours, LLC)

03/29/14	cborourk 0021	Review service issues.	0.10	19.00
04/01/14	jemurphy 0021	Strategy regarding alternate means to investigate addresses and attempt service; review court's notice of returned mail to J. Tull and the Ellisons.	0.10	25.50
04/05/14	cborourk 0021	Analyze service issues.	0.20	38.00
04/09/14	cborourk 0021	Review service issues; revise AP tracking chart; strategy regarding acceptance/waiver of service and draft same; compile service package for forwarding to R. Boyd.	1.10	209.00
04/09/14	jemurphy 0021	Phone calls with Reese Boyd regarding settlement and extension of answer deadline for J. Tull; review options for acceptance of service and extension of answer deadline; strategy regarding opportunity for and form of J. Tull's rebuttal to investigation report.	1.40	357.00
04/09/14	goneil 0021	Assist with service issues and strategy regarding potential settlements.	0.10	25.50
04/11/14	jemurphy 0021	Edit Affidavit of Acceptance of Service of complaint and preliminary injunction for J. Tull; draft Declaration of Electronic Filing; communications with Attorney Boyd regarding the same.	0.30	76.50
04/14/14	cborourk 0021	Draft motion to continue answer deadline with expedited determination and proposed order.	0.60	114.00
04/14/14	cborourk 0021	Draft summary of attempted service and service issues with respect to J. Tull.	0.20	38.00
04/14/14	jemurphy 0021	Communications with Attorney Boyd regarding possible Tull settlement.	0.20	51.00
04/14/14	jemurphy 0021	Attend to preparation of Amended Certificate of Service and Motion to Extend Answer deadline for J. Tull.	0.20	51.00
04/15/14	kmdellec 0021	Assist with preparation of supplemental certificate of service regarding service of complaint and affidavit of acceptance of service and e-filing of same.	0.30	55.50
04/15/14	jemurphy 0021	Initial settlement discussions with Attorney Boyd (for J. Tull).	0.20	51.00
04/22/14	jemurphy 0021	Communications with Attorney Boyd regarding Tull's settlement offer and supporting financial information.	0.30	76.50
04/23/14	JHB 0021	Analysis regarding offer, financial condition.	0.20	78.00
04/23/14	cborourk 0021	Review affidavit of Judy Tull; online research regarding present address; review Denton County	0.50	95.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

Date	Client	Case No.	Description	Hours	Amount
			TX Registry of Deeds to determine property owner.		
04/23/14	jemurphy	0021	Phone call with Attorney Boyd regarding Tull settlement; review Tull Personal Financial Statement and ownership of property associated with Tull.	0.80	204.00
04/24/14	JHB	0021	Negotiations regarding settlement with Attorney Boyd, review underlying Complaint, financial information.	0.90	351.00
04/24/14	kmdellec	0021	Review correspondence from Attorney Boyd; confirm answer deadline.	0.20	37.00
04/24/14	jemurphy	0021	Review settlement discussions with the Trustee and Attorney Boyd (for J. Tull); evaluate settlement offers.	0.30	76.50
04/24/14	goneil	0021	Strategize regarding settlement offer and bankruptcy.	0.10	25.50
04/24/14	goneil	0021	Review emails between Trustee and Atty. Boyd regarding settlement negotiations.	0.10	25.50
04/25/14	JHB	0021	Continue negotiations with Attorney Boyd and reach settlement; review related documentation.	0.60	234.00
04/25/14	jemurphy	0021	Review settlement communications from Attorney Boyd; evaluate proposed settlement terms for J. Tull; evaluate strength of overall settlement offer and impact on claims against other parties.	1.30	331.50
04/25/14	goneil	0021	Review new settlement terms with Ms. Tull.	0.10	25.50
04/29/14	goneil	0021	Review status of settlement and implications of same on others' settlement positions.	0.10	25.50
05/01/14	jemurphy	0021	Outline and begin to draft Stipulation of Settlement and Motion to Approve Settlement with J. Tull.	3.20	816.00
05/01/14	goneil	0021	Assist with preparation of settlement pleadings.	0.10	25.50
05/02/14	jemurphy	0021	Review first settlement payment from J. Tull and communications with Attorney Boyd confirming the same.	0.10	25.50
05/06/14	JHB	0021	Revise settlement agreement, review underlying complaint, transfer materials.	0.30	117.00
05/06/14	cborourk	0021	Draft agreement for judgment as to Judy Tull.	0.50	95.00
05/06/14	jemurphy	0021	Further draft Stipulation of Settlement and Motion to Approve Settlement for Tull settlement.	1.80	459.00
05/07/14	jemurphy	0021	Final edits to Stipulation of Settlement and Motion to Approve Settlement with J. Tull;	1.20	306.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		draft Agreement for Judgment for J. Tull's execution; communications with Attorney Boyd regarding execution and timing of the filing of the same.		
05/08/14	JHB	0021	Review Boyd revisions to settlement agreement and comment on same.	0.20 78.00
05/08/14	jemurphy	0021	Review and response to Attorney Boyd's proposed edits to the Stipulation of Settlement with J. Tull.	0.30 76.50
05/08/14	goneil	0021	Review status of Tull settlement and answer.	0.10 25.50
05/09/14	JHB	0021	Review final form of settlement agreement, related payment issues.	0.20 78.00
05/09/14	cborourk	0021	Draft motion to approve settlement agreement with J. Tull, with proposed order.	0.50 95.00
05/12/14	JHB	0021	Continued attention to open settlement, payment, extension issues, strategies if no resolution, and review related emails, discovery from opposing counsel.	0.30 117.00
05/14/14	JHB	0021	Revise proposed settlement motion, review related exchange with Attorney Boyd.	0.20 78.00
05/14/14	jemurphy	0021	Edit and further draft Motion to Approve Tull Settlement, including financial representations (existing and additional) regarding Tull's household finances; identify additional financial affirmations to be made by J. Tull and process for doing so; communications with Attorney Boyd regarding the same.	2.10 535.50
05/15/14	kmdellec	0021	Draft motion to limit notice and certificate of service regarding approval pleadings; review and revise; review pacer and update service list.	1.40 259.00
05/15/14	jemurphy	0021	Review J. Tull statement regarding facts in the Motion to Approve Settlement; attend to preparation of Motion to Limit Notice of Settlement.	0.30 76.50
05/16/14	kmdellec	0021	Assist with efilng of settlement pleadings; telephone call to Janet at Bankruptcy Court regarding disregarded docket entry; update control sheet.	0.30 55.50
05/16/14	jemurphy	0021	Review Court docket; communications with Attorney Boyd regarding settlement status.	0.10 25.50
05/30/14	kmdellec	0021	Review pacer docket and update litigation control sheet accordingly.	0.10 18.50
06/04/14	jemurphy	0021	Telephone call with Attorney Boyd regarding	0.10 25.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

pending second and final J. Tull settlement
payment.

06/05/14 JHB	0021	Review open payment approval issues and emails.	0.20	78.00
06/05/14 jemurphy	0021	Review second J. Tull settlement payment; communications with Attorney Boyd regarding the same.	0.10	25.50
06/10/14 jemurphy	0021	Review court's order approving settlement with J. Tull; attend to completing settlement.	0.30	76.50
06/24/14 kmdellec	0021	Review pacer docket as to certain dates/deadlines; draft notice of dismissal as to Judy Tull only; review and revise same; confirm service list.	1.00	185.00
06/27/14 kmdellec	0021	Finalize notice of dismissal for efiling/service.	0.10	18.50
06/27/14 jemurphy	0021	Review and attend to filing Voluntary Dismissal of J. Tull.	0.10	25.50
06/30/14 kmdellec	0021	Review status of case/update litigation control sheet accordingly.	0.20	37.00
07/25/14 kmdellec	0021	Review status of case and update control chart accordingly.	0.10	19.50
07/28/14 kmdellec	0021	Review revisions to updated control chart.	0.10	19.50
08/01/14 kmdellec	0021	Review Form 2 and update litigation control chart as to settlement proceeds received/expected.	0.10	19.50
TYPE	0021	TOTAL	27.60	6,972.00

TASK: 0022 Adversary Proceeding

Attorney Summary	Hours	Value	Rate
139 JHB Joseph H. Baldiga	7.40	2,891.00	390.68
290 goneil Gina B. O'Neil	1.40	362.00	258.57
255 cborourk Cori B. O'Rour	3.50	665.00	190.00
281 jemurphy Jessica E. Mur	19.30	4,960.50	257.02
274 kmdellec Kimberly M. De	7.20	1,350.00	187.50
TYPE 0022	TOTAL	38.80	10,228.50

Time Detail	Hours	Value
03/03/14 goneil 0022 Strategize regarding format of Complaint and counts associated with same (.1); strategize	0.20	51.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

		regarding production of final numbers for Complaint (.1).		
03/13/14	JHB 0022	Review final form of complaint, underlying transfer materials, execute verification.	0.40	156.00
03/20/14	jemurphy 0022	Review and attempt to address service issues of adversary proceeding complaints against J. Tull and the Ellisons with counsel.	0.10	25.50
03/24/14	jemurphy 0022	Review returned service on J. Tull and the Ellisons; strategy regarding next steps to make service; attend to obtaining alternative address from USPS.	0.10	25.50
03/29/14	cborourk 0022	Review service issues.	0.10	19.00
04/01/14	cborourk 0022	Strategic planning with Attorney Murphy regarding alternate service.	0.10	19.00
04/01/14	jemurphy 0022	Strategy regarding alternate means to investigate addresses and attempt service; review court's notice of returned mail to J. Tull and the Ellisons.	0.20	51.00
04/05/14	cborourk 0022	Analyze service issues.	0.20	38.00
04/05/14	cborourk 0022	Analyze service issues.	0.20	38.00
04/07/14	jemurphy 0022	Review Motions for Admission Pro Hac Vice for the Ellisons; strategy regarding impact of new counsel and next steps.	0.20	51.00
04/07/14	goneil 0022	Assist with assessment of pro hac motion and service upon counsel based on same.	0.10	25.50
04/08/14	jemurphy 0022	Review USPS address responses for the Ellisons and J. Tull; strategy regarding next steps to accomplish service or prepare motion for a late service.	0.20	51.00
04/08/14	jemurphy 0022	Phone call to Attorney Sheatsley regarding pro hac motions and acceptance of service for defendants.	0.10	25.50
04/09/14	cborourk 0022	Review service issues and revise AP tracking chart.	0.20	38.00
04/09/14	cborourk 0022	Review service issues and revise AP tracking chart.	0.10	19.00
04/09/14	goneil 0022	Assist with service issues and strategy regarding potential settlements.	0.10	25.50
04/10/14	jemurphy 0022	Edit Acceptance of Service pleadings.	0.30	76.50
04/10/14	jemurphy 0022	Phone call from Attorney Boyd regarding extending answer deadline and initial settlement discussions; conference with Trustee on Attorney Boyd's request.	0.40	102.00
04/10/14	jemurphy 0022	Phone call with Attorney Sheatsley regarding	0.50	127.50

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

the claims against the Ellisons, extension of
their answers and initial settlement
discussions.

04/11/14 jemurphy 0022	Phone call with Attorney Sheatsley regarding the cases against the Ellisons, service and deadlines for their answers.	0.20	51.00
04/14/14 cborourk 0022	Draft summary of attempted service and service issues with respect to K. Ellison.	0.20	38.00
04/14/14 jemurphy 0022	Communications with Attorney Sheatsley regarding the Ellisons' Answers and settlement.	0.30	76.50
04/14/14 jemurphy 0022	Phone call with Attorney Sheatsley regarding extension of Ellisons' answer deadline.	0.20	51.00
04/14/14 jemurphy 0022	Motion to Extend Answer Deadlines for J. Tull, K. Ellison and S. Ellison.	1.10	280.50
04/15/14 cborourk 0022	Finalize certificate of service regarding motion to extend and determine parties for service.	0.30	57.00
04/15/14 kmdellec 0022	Assist with preparation and efilng of motion to extend answer deadline.	0.10	18.50
04/15/14 kmdellec 0022	Assist with preparation and efilng of motion to extend answer deadline.	0.10	18.50
04/15/14 jemurphy 0022	Final edits to Motions to Extend Answer Deadlines, Supplemental Certificates of Service and Affidavits of Acceptance of Service for J. Tull, K. Ellison and S. Ellison; confer with respective counsel regarding execution and filing of the same; prepare to file with the Court; review Court's endorsements on filed motions and communications with respective counsel regarding the same and next steps.	2.40	612.00
04/23/14 jemurphy 0022	Strategy with Trustee regarding settlement parameters for founding members.	0.30	76.50
04/30/14 jemurphy 0022	Review the Ellisons' draft Motion to Access Radixx Data and financial records of the Ellisons' provided by Attorney Sheatsley; phone call with Attorney Sheatsley regarding the motion and settlement; begin to evaluate settlement considerations based on the Ellisons' financials.	1.10	280.50
05/01/14 JHB 0022	Continued review and assessment of defense assertions, settlement proposals, and devise response strategies.	0.40	156.00
05/01/14 JHB 0022	Continued review and assessment of defense assertions, settlement proposals, and devise	0.40	156.00

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15008 Joseph H. Baldiga, Chapter 7 Trustee
14190 Direct Air (Southern Sky Air & Tours, LLC)

05/01/14 jemurphy 0022	response strategies. Initial evaluation of the Ellisons' settlement offer; draft memorandum to Trustee regarding same.	0.50	127.50
05/01/14 goneil 0022	Review Trustee's memoranda regarding settlement offer and next steps for response.	0.10	25.50
05/02/14 jemurphy 0022	Prepare for settlement call; phone call with Attorney Sheatsley and Attorney Collins regarding settlement of the claims against the Ellisons.	0.80	204.00
05/02/14 jemurphy 0022	Review the Ellisons' residential and property ownership information from call with counsel.	0.20	51.00
05/02/14 goneil 0022	Strategize regarding settlement offer and saleable assets.	0.10	25.50
05/05/14 JHB 0022	Continued negotiations, strategies, assessment of defense.	0.40	156.00
05/05/14 jemurphy 0022	Prepare for further settlement call; phone call with Attorney Sheatsley and Attorney Collins regarding settlement for the Ellisons; evaluate settlement offer with the Trustee.	0.40	102.00
05/06/14 JHB 0022	Continued analysis, strategies regarding settlement negotiations, revise counteroffer.	0.60	234.00
05/06/14 jemurphy 0022	Further strategy with Trustee regarding settlement with the Ellisons; draft correspondence to counsel with settlement counteroffer.	0.30	76.50
05/07/14 JHB 0022	Continued settlement negotiations with Attorneys for Ellisons, and review related defense, transfer materials.	0.40	156.00
05/07/14 jemurphy 0022	Communications with Attorney Sheatsley and Attorney Collins regarding Trustee's settlement position with respect to the Ellisons.	0.10	25.50
05/08/14 JHB 0022	Continue negotiations for settlement, review new defense arguments, materials.	0.30	117.00
05/08/14 jemurphy 0022	Phone call from Attorney Sheatsley to discuss ongoing settlement negotiations.	0.20	51.00
05/09/14 JHB 0022	Continue settlement negotiations, assess counteroffer and security for proposed installments, further analysis regarding available assets and possible real estate equity, reach agreement.	1.10	429.00
05/09/14 jemurphy 0022	Review and edit K. Ellison and S. Ellison's Motions to Extend Answer Deadlines; multiple communications with Attorney Sheatsley	0.30	76.50

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05/09/14	jemurphy 0022	regarding the same. Further communications with Attorney Sheatsley regarding settlement offer from the Ellisons; evaluate offer with the Trustee.	0.30	76.50
05/12/14	JHB 0022	Continued attention to open settlement, payment, extension issues, strategies if no resolution, and review related emails, discovery from opposing counsel.	0.30	117.00
05/15/14	JHB 0022	Further review of open issues, settlement negotiations, assess defenses and devise strategies to resolve; review related discovery issues, opposing counsel emails.	0.30	117.00
05/15/14	jemurphy 0022	Phone call and draft correspondence regarding settlement with the Ellisons.	0.40	102.00
05/16/14	JHB 0022	Continued negotiations with opposing counsel.	0.20	78.00
05/16/14	jemurphy 0022	Communications with Attorney Sheatsley regarding the Ellisons' motions.	0.10	25.50
05/16/14	goneil 0022	Review status of matters, including new docket entries in case.	0.10	25.50
05/19/14	JHB 0022	Continue settlement negotiations and devise response strategies regarding dismissal and reference withdrawal motions.	0.60	234.00
05/19/14	cborourk 0022	Draft stipulation of settlement with Kay Ellison; draft motion to approve settlement, with proposed order, motion to limit notice and certificate of service; compile service list.	1.50	285.00
05/19/14	jemurphy 0022	Review Answers and Motions filed by the Ellisons, and Court's schedule for oppositions and hearings on the same; communications with Attorney Sheatsley regarding the motions and pending settlement negotiations.	0.40	102.00
05/19/14	jemurphy 0022	Communications with Attorney Sheatsley regarding settlement terms; attend to preparation of draft settlement documents.	0.40	102.00
05/19/14	jemurphy 0022	Phone call with Trustee regarding claims against Ellisons.	0.10	25.50
05/20/14	cborourk 0022	Review and revise settlement pleadings regarding Kay Ellison.	0.60	114.00
05/20/14	jemurphy 0022	Strategy and edits to Motion to Approve Settlement and Stipulation for the Ellisons.	0.50	127.50
05/21/14	goneil 0022	Assist with formatting and preparing Stipulation and related pleadings.	0.10	25.50
05/29/14	JHB 0022	Review status of avoidance action and next steps.	0.20	78.00

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05/29/14 kmdellec 0022	Track receipt of order and deadline to file settlement pleadings.	0.10	18.50
05/29/14 jemurphy 0022	Review Court's ruling on Motions to Extend Ellisons' Motion to Dismiss and Motion to Withdraw the Reference; plan for filing settlement paper work within Court's deadline.	0.20	51.00
05/30/14 kmdellec 0022	Review pacer docket and update litigation control sheet accordingly.	0.20	37.00
05/30/14 kmdellec 0022	Review pacer docket and update litigation control sheet accordingly.	0.20	37.00
06/02/14 kmdellec 0022	Additional updates to litigation control sheet.	0.10	18.50
06/02/14 kmdellec 0022	Additional updates to litigation control sheet.	0.10	18.50
06/05/14 kmdellec 0022	Review status of deadline for settlement pleadings.	0.10	18.50
06/05/14 kmdellec 0022	Review status of deadline for settlement pleadings.	0.10	18.50
06/09/14 kmdellec 0022	Review status of settlement pleadings; confirm deadline to file.	0.10	18.50
06/09/14 kmdellec 0022	Review status of settlement pleadings; confirm deadline to file.	0.10	18.50
06/09/14 jemurphy 0022	Communications with Attorney Sheatsley regarding settlement with the Ellisons.	0.30	76.50
06/10/14 JHB 0022	Continued attention to open settlement, drafting issues.	0.20	78.00
06/10/14 kmdellec 0022	Review temporary restraining order and proposed settlement agreement; draft assented-to motion to continue (I) current temporary restraining order and (II) hearing on plaintiff's application for preliminary injunction with proposed order and certificate of service; review and revise (x2).	2.60	481.00
06/10/14 jemurphy 0022	Attend to preparation of Motion to Extend Temporary Restraining Order and Move Preliminary Injunction hearing.	0.20	51.00
06/11/14 JHB 0022	Strategies, emails to address injunction extension, open settlement issues.	0.30	117.00
06/11/14 kmdellec 0022	Additional revisions to assented-to motion to continue current temporary restraining order and hearing on plaintiff's application for preliminary injunction; discuss efilings/service of same.	0.30	55.50
06/11/14 jemurphy 0022	Review and edit Motion to Continue Temporary Restraining Order and continue hearing on Preliminary Injunction for the Ellisons;	0.20	51.00

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	communications with Attorney Sheatsley regarding the same.		
06/11/14 jemurphy 0022	Edits to and further draft Stipulation of Settlement for the Ellisons, Agreements for Judgments for the Ellisons and a Motion to Approve Stipulation; communications with Attorney Sheatsley regarding the same.	0.80	204.00
06/12/14 JHB 0022	Review open settlement issues, revised materials, related extension issues and resolution.	0.30	117.00
06/12/14 kmdellec 0022	Assist with efilng of settlement pleadings and motion to continue hearing on TRO; confirm service list and query.	0.50	92.50
06/12/14 kmdellec 0022	Assist with efilng of settlement pleadings and motion to continue hearing on TRO; confirm service list and query.	0.50	92.50
06/12/14 jemurphy 0022	Communications with Attorney Sheatsley regarding the settlement documents and motions to continue TRO/PI and other dates; make edits to the same; attend to filing Motion to Approve Settlement, Stipulation of Settlement, Motion to Limit Notice and Motion to Continue with the Court; review settlement documents and certification executed by the Ellisons; attend to arrangements for settlement payments.	1.00	255.00
06/12/14 goneil 0022	Assist with filing of Stipulation.	0.10	25.50
06/30/14 kmdellec 0022	Review status of case/update litigation control sheet accordingly.	0.20	37.00
07/10/14 kmdellec 0022	Draft certificate of service regarding notice of hearing regarding settlement; review/confirm service list.	0.30	58.50
07/10/14 kmdellec 0022	Draft certificate of service regarding notice of hearing regarding settlement; review/confirm service list.	0.20	39.00
07/10/14 goneil 0022	Review settlement pleadings in light of upcoming court-set hearing.	0.10	26.50
07/11/14 jemurphy 0022	Review Court's Notice of Hearing on Ellisons settlement; attend to service of notice.	0.10	26.50
07/14/14 kmdellec 0022	Finalize certificate of service regarding notice of hearing regarding settlement pleadings and review service list.	0.20	39.00
07/14/14 kmdellec 0022	Finalize certificate of service regarding notice of hearing regarding settlement pleadings and review service list.	0.20	39.00

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07/18/14	JHB	0022	Review open settlement issues, strategies for 8/7 hearing.	0.20	79.00
07/22/14	jemurphy	0022	Review Motion to Appear Telephonically for hearing on Ellison's settlement; review court's orders regarding the same.	0.20	53.00
07/25/14	kmdellec	0022	Review status of case and update control chart accordingly.	0.10	19.50
07/25/14	kmdellec	0022	Review status of case and update control chart accordingly.	0.10	19.50
07/28/14	kmdellec	0022	Review revisions to updated control chart.	0.10	19.50
07/28/14	kmdellec	0022	Review revisions to updated control chart.	0.10	19.50
08/01/14	kmdellec	0022	Review Form 2 and update litigation control chart as to settlement proceeds received/expected.	0.10	19.50
08/04/14	kmdellec	0022	Determine status of current MODL fees/expenses in preparation of hearing on proposed settlement.	0.10	19.50
08/04/14	jemurphy	0022	Review status of adversary proceeding and next steps.	0.10	26.50
08/05/14	JHB	0022	Conference with Attorney Murphy regarding support for settlement approval, information for 8/7 hearing, and review underlying case data regarding same.	0.40	158.00
08/05/14	goneil	0022	Assist with preparations for settlement.	0.20	53.00
08/06/14	JHB	0022	Continued preparation for 8/7 settlement hearing.	0.20	79.00
08/06/14	jemurphy	0022	Review Ellisons' asset information, settlement terms and grounds for acceptance of settlement offer in preparation for hearing; review overall status of Trustee's adversary proceedings and recovery for the estate.	0.80	212.00
08/07/14	JHB	0022	Follow up regarding settlement, implications for future settlements.	0.20	79.00
08/07/14	kmdellec	0022	Track approval order; calendar ahead file preparation/filing of stipulation of dismissal.	0.10	19.50
08/07/14	jemurphy	0022	Attend hearing in Bankruptcy Court on Motion to Approve Ellisons' settlement.	1.90	503.50
08/07/14	jemurphy	0022	Preparation for hearing on Motion to Approve Ellisons' settlement.	0.40	106.00
08/07/14	jemurphy	0022	Attention to resolution of the balance of the adversary proceeding.	0.10	26.50
08/07/14	goneil	0022	Review memorandum regarding stipulation approval hearing.	0.10	26.50
08/08/14	jemurphy	0022	Review correspondence from Attorney Sheatsley	0.30	79.50